

FEARNA STORAGE

Fearna Pumped Storage Hydro Scheme EIA Report

Appendix 8.7 – Outline Biodiversity Enhancement and Management Plan (OBEMP)

February 2025



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Fearna Pumped Storage Scheme Outline Biodiversity Enhancement and Management Plan (OBEMP)



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EXECUTIVE SUMMARY

EnviroCentre Limited was commissioned by Fearna PSH Ltd to prepare an Outline Biodiversity Enhancement and Management Plan (OBEMP) for the Loch Fearna Pumped Storage Hydro (PSH) and associated Southern Access Road (SAR) development near Invergarry, the Proposed Development. This OBEMP has been developed to support the Environmental Impact Assessment (EIA) for the Proposed Development and outlines proposed habitat restoration and biodiversity enhancement measures to compensate for direct habitat loss and indirect effects, notably on blanket bog, heathland, and native woodland.

The EIA has identified significant potential impacts, including the permanent loss or temporary degradation of sensitive habitats, peat disturbance, and associated effects on protected species such as otter, pine marten, red squirrel, amphibians, reptiles, and notable SBL invertebrates. To mitigate these impacts, the OBEMP proposes extensive habitat restoration and enhancement measures, including large-scale peatland and woodland restoration across identified areas within FLS Glengarry Forest, East and West Glenquoich Estates, and land owned by SSE Generation.

Key habitat management prescriptions include:

- Restoration of approximately 640 ha of peatland within FLS Glengarry Forest to offset losses of blanket bog habitat, with additional bog pool creation specifically targeting dragonfly species.
- Compensatory woodland creation and extensive woodland restoration of no less than 200ha, including regeneration of Annex I Caledonian pine forests and creation of native woodlands, primarily within riparian zones of the River Garry, Loch Poulary, and surrounding areas.
- Targeted control and management of invasive non-native species (INNS) *Rhododendron ponticum*, covering over 100 ha around sensitive ancient woodland habitats.
- Implementation of deer management measures, including deer exclusion fencing and targeted culling, to facilitate natural regeneration of sensitive upland habitats.
- Further ecological enhancements include the installation of artificial nesting boxes for birds and bats, and floating nesting islands specifically designed to support breeding Common Scoter and Black-throated diver in nearby waterbodies. Additionally, aquatic and riparian habitat enhancements have been proposed, benefiting species including Common Scoter, Atlantic salmon, otter, and aquatic invertebrates.
- Targeted bog pool creation and restoration within peatland areas, with specific focus on dragonfly habitat, in combination with a potential larval translocation programme (including of the nationally-scarce azure hawker) from within the Proposed Development,

Monitoring and adaptive management practices form a critical component of the OBEMP, designed to assess the effectiveness of the implemented measures, with regular reviews and stakeholder consultations planned throughout the project lifetime. This plan aims to achieve significant, measurable biodiversity net gain and long-term ecological sustainability across the affected area.

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1 INTRODUCTION

1.1 Terms of Reference

EnviroCentre Limited was commissioned by Fearna PSH Ltd to produce an Outline Biodiversity Enhancement and Management Plan (OBEMP) for the Loch Fearna Pumped Storage Hydro (PSH) and related Southern Access Road (SAR), the Proposed Development, to accompany the Environmental Impact Assessment (EIA) for the Proposed Development.

The 'site' is defined as the area comprising of the entirety of the PSH and the SAR (western extent, areas of passing places and felling works and site compound area) and related buffers.

1.2 Scope and Purpose of the OBEMP

This OBEMP outlines proposed habitat restoration and management measures that would form part of the Proposed Development. These proposals and measures form an integral part of the evaluation and assessment of the 'Residual Impacts' of the Proposed Development over the medium-long term, within the main EIA itself

It details the potential habitat management and monitoring that is proposed to compensate for the direct loss and indirect effects of sensitive/semi-natural habitats, notably blanket bog, heathland, and native woodland, and to provide significant biodiversity enhancements, in accordance with planning policy requirements, including National Planning Framework 4 (NPF4).

This OBEMP is intended as a precursor to a more detailed Biodiversity Enhancement and Management Plan (BEMP), which would be produced and agreed with The Highland Council (THC), in consultation with NatureScot and Scottish Environment Protection Agency (SEPA) post consent, prior to the commencement of construction. It is not the intention for this document to provide full details of proposed management, many of which cannot be determined fully at this stage. Issues relating specifically to the construction of the Proposed Development (e.g. pollution control, disturbance to fauna) are not considered here. Further information regarding ecological mitigation measures to be employed during the construction and operational phase is included in EIA Report Volume 1, Chapter 2: The Proposed Development, Chapter 8: Terrestrial Ecology, Chapter 9: Forestry and Chapter 10: Ornithology. A summary of all mitigations for the Proposed Development is included at Chapter 19: Mitigation Schedule.

The spatial scope of the OBEMP extends across the FLS Glengarry Forest, West Glenquoich Estate, East Glenquoich Estate, and land owned by SSE Generation. The outline proposals presented here have been discussed with relevant landowners and will be agreed upon as part of further consultation.

The 30-year duration of this OBEMP aligns with UK statutory requirements under the Environment Act 2021, which mandates that biodiversity enhancements associated with development projects be secured and maintained for a minimum of 30 years after the completion of work¹.

¹ Available at: [Environment Act 2021](#)

1.3 Site Description

PSH Site

The PSH is situated to the north of Loch Quoich approximately 24km west of Invergarry, centred at National Grid Reference (NGR) NH 05162 03136, within ground ranging between approximately 210m and over 900m in altitude. The survey area extends over approximately 510 hectares (ha) and comprises south and southwest-facing slopes and corries of upland blanket mire, heathland, and flush habitat; burns with associated riparian woodland; acid grassland, bracken, mire, and heath habitats in the lower lying ground and a rock shingle beach along Loch Quoich's shoreline.

The PSH is surrounded by the mountainous peaks of Gleouraich and Spidean Mialach, with the site's northeastern extent containing the freshwater Loch Fearnna, (approximately 10.16 ha) within a mountain basin (Coire Glas). Multiple small watercourses flowing from the southwestern slopes of Spidean Mialach feed Loch Fearnna. Loch Fearnna has a natural outflow (Allt Fearnna) to the southwest which flows through a deep ravine and discharges into Loch Quoich. The Allt a' Mheil in the west edge of the site flows south into Loch Quoich from the slopes of Coire Dubh. Loch Quoich is dammed in its east and west extents as a component of an existing hydro electric scheme.

The PSH area is split between three land ownerships – West Glenquoich Estate, East Glenquoich Estate, and SSE Generation. Much of the survey area is managed for deer stalking by the local estates. Access into the upper hill ground is via an estate track which located west of the Allt a' Mheil, west of the proposed site. The track runs steeply upslope where it terminates at c. 400m altitude at a small dam. There are no deer fences within the survey area and deer have uninhibited access across the site. There are no estate tracks within the upper hill ground of Coire Dubh and Loch Fearnna, and access is minimal beyond a small trail which intercepts the site and leads to Spidean Mialach. The PSH area is not managed as a grouse moor and there is no evidence of historic burning within the peatland vegetation. Sheep presence was noted on site but at low abundance and frequency of droppings was low. No contemporary or historic moor grips were noted during the field survey, although these are present in areas outwith the PSH site that may be subject to restoration under this plan. The peatland habitats are considered to be mostly in good condition² and have generally not undergone drainage.

SAR Site Area

The SAR comprises a linear route extending from near Loch Quoich (where the proposed Loch Fearnna PSH will be located), centred at Ordnance Survey National Grid Reference (NGR) NH 05162 03136, to the east of Loch Garry, centred at NGR NH 27753 01997, and ranges between 90m-300m of elevation.

The eastern section of the SAR follows existing forestry tracks, extending approximately (approx.) 23.5km from the Glen Garry car park to the River Kingie Crossing. The western section of the SAR is proposed to involve construction of a new forest road through non-native conifer plantation and open heathland and extends approx. 4.3km from the River Kingie to the existing unnamed road, approx. 550m east of the Quoich Dam.

More widely, the landscape surrounding the SAR is dominated by open heathland and bog habitats, with plantation blocks and semi-natural woodlands scattered throughout, typically at lower altitudes and along riparian corridors. An extensive hydrological network is present across the region, comprising several large waterbodies, including Lochs Garry, Quoich, Loyne, and Oich, as well as major river systems within the Ness catchment area. The village of Invergarry is situated approx. 1.3km east of the SAR.

² In accordance with the Defra Biodiversity Metric Condition Assessment Guidance

1.4 Relevant Consultation

The Highland Council and NatureScot have been consulted on the requirements for and of the OBEMP through the Pre-application and scoping processes.

In addition consultation has taken place during the development of the OBEMP with the RSPB, the Ness District Salmon Fishery Board, Trees for Life, the British Dragonfly Society, the Glengarry Community Council, members of the local community and the landowners within whose ground the OBEMP measures are proposed.

1.5 Legislation and Planning Policy

National policies and legislation of relevance to the OBEMP, through which biodiversity is targeted, include:

- Nature Conservation (Scotland) Act 2004
- National Planning Framework 4³
- Natural Environment and Rural Communities Act (2006) Section 41 (S. 41)⁴
- Scottish Biodiversity List (SBL)⁵
- Scottish Biodiversity Strategy to 2045⁶
- Scottish Planning Policy (SPP: 2014)⁷
- Planning (Scotland) Act 2019⁸
- Highland Council Biodiversity Planning Guidance⁹
- The Highland Council Local Development Plan (2012)^{10,11}
- Highland Nature: Biodiversity Action Plan 2021 - 2026¹²

1.6 Approach to Providing Biodiversity Net Gain

The approach to achieving Biodiversity Net Gain used here focuses on developing and agreeing upon tailored compensation and enhancement, rather than relying on a standardised metric approach. This method has been chosen for the following reasons.

A key aspect of the proposed compensation and enhancement strategy comprises substantial peatland restoration, which requires a bespoke approach under the current Defra Biodiversity Metric, following guidance by NatureScot¹³. Additionally, because the site includes areas recorded in the

³ Available at: <https://www.gov.scot/publications/national-planning-framework-4/>

⁴ Available at: <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁵ Available at: <https://www.nature.scot/doc/scottish-biodiversity-list>

⁶ Scottish Government (2023) Scottish Biodiversity Strategy to 2045: Tackling the Nature Emergency in Scotland. <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2023/09/scottish-biodiversity-strategy-2045-tackling-nature-emergency-scotland-2/documents/scottish-biodiversity-strategy-2045-tackling-nature-emergency-scotland/govscot%3Adocument/scottish-biodiversity-strategy-2045-tackling-nature-emergency-scotland.pdf>

⁷ Available at: <https://www.gov.scot/publications/scottish-planning-policy/pages/2/>

⁸ Available at: <https://www.legislation.gov.uk/asp/2019/13/contents>

⁹ Highland Council. Available at:

https://www.highland.gov.uk/download/meetings/id/82400/item_6_draft_biodiversity_planning_guidance

¹⁰ Highland-wide Local Development Plan (2012). Available at:

https://www.highland.gov.uk/info/178/development_plans/199/highland-wide_local_development_plan

¹¹ The Highland Council are currently formulating an updated local development plan for the region, with the proposed plan stage planned for 2025.

¹² Highland Nature BAP 2021-2026. Available at:

https://www.highland.gov.uk/downloads/download/2260/highland_nature_biodiversity_action_plan_2021_to_2026

¹³ Available at: [Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot](#)

Ancient Woodland Inventory and supports blanket bog, specific compensation measures must be agreed upon under the Defra Biodiversity Metric.

For the remaining habitats, a bespoke compensation and enhancement strategy is considered more suitable than a metric-driven approach. This is due to the characteristics of the project, the types of habitats affected, and the specific opportunities available for habitat improvement within the site and surrounding estates, which do not necessarily align with standard metric trading requirements.

The proposals outlined within this document are considered to be the most appropriate strategy for the estates and local environment. They have been designed to deliver significant conservation benefits while taking into account estate management constraints and landowner priorities.

1.7 Report Usage

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2 METHODOLOGY

The aim of this OBEMP is to establish the key objectives and principles for ecological restoration and management across the estates and holdings surrounding the site, with this forming a basis for the fully detailed BEMP, post consent.

2.1 Terminology Hierarchy

In line with established principles and standards from the Society for Ecological Restoration¹⁴, the following hierarchy of terminology for restoration planning has been utilised:

- The **Scope** is the broad geographic or thematic focus of the project.
- The **Vision** is a general summary of the desired condition one is trying to achieve through the work of the project.
- The **Targets** identify the native ecosystems to be restored as informed by the reference model, along with any social outcomes or constraints expected of the project.
- **Goals** are formal statements of the medium to long-term desired ecological condition, including the level of recovery sought. Goals must be clearly linked to targets, measurable, time-limited, and specific.
- **Objectives** are formal statements of the interim outcomes along the trajectory of recovery. Objectives must be clearly linked to targets and goals, and be measurable, time-limited, and specific.

2.2 Baseline Data Collection

This OBEMP is informed by data collected for the desk-study, habitat and species-specific surveys, carried out as part of the EIA, and additional surveys specifically to assess opportunities for compensation and biodiversity net gain works outwith the direct area of the Proposed Development. Full details are provided in the relevant appendices of the EIA report, as summarised below:

- PSH and SAR National Vegetation Classification Survey Reports^{15, 16}, which provides baseline data on botanical communities and associated habitats present across the site, undertaken across the PSH in June 2023 and the SAR in June 2024, utilising standard methodology^{17, 18, 19}.
- PSH and SAR Protected Species Survey Reports^{20, 21}, and, which provide results of baseline survey/assessment for bats (*Chiroptera spp.*), otter (*Lutra lutra*), water vole (*Arvicola*

¹⁴ Society for Ecology Restoration (2019). International Principles and Standards for the Practice of Ecological Restoration. Second Edition.

¹⁵ EnviroCentre (2023). PSH National Vegetation Classification Survey Report

¹⁶ EnviroCentre (2024). SAR National Vegetation Classification and UKHab Survey Report.

¹⁷ UKHab Ltd (2023). UK Habitat Classification Version 2.0 (Available at: <https://www.ukhab.org>)

¹⁸ Rodwell, J.S. (2006). National Vegetation Classification: Users' Handbook. JNCC

¹⁹ Rodwell, J.S. (1991) *British Plant Communities, Volume 1: Woodlands and Scrub*. Cambridge University Press, Cambridge.

Rodwell, J.S. (1991) *British Plant Communities, Volume 2: Mires and Heaths*. Cambridge University Press, Cambridge.

Rodwell, J.S. (1992) *British Plant Communities, Volume 3: Grasslands and Montane Communities*. Cambridge University Press, Cambridge.

Rodwell, J.S. (1995) *British Plant Communities, Volume 4: Aquatic Communities, Swamps and Tall-herb Fens*. Cambridge University Press, Cambridge.

Rodwell, J.S. (2000) *British Plant Communities, Volume 5: Maritime Communities and Vegetation of Open Habitats*. Cambridge University Press, Cambridge.

²⁰ EnviroCentre (2023). Fearna PSH Protected, Notable and Invasive Non-Native Species Survey Report.

²¹ EnviroCentre (2024). Fearna SAR Protected Species Assessment Report.

amphibius), badger (*Meles meles*), red squirrel (*Sciurus vulgaris*), pine marten (*Martes martes*), mountain hare (*Lepus timidus*), deer, amphibians, reptiles, and Invasive Non-Native Species (INNS) for the site, plus appropriate buffers, undertaken across the PSH in June 2023 and the SAR in June 2024, utilising standard methodologies^{22, 23, 24, 25, 26, 27, 28, 29, 30}.

- SAR Otter Assessment and Monitoring Report³¹, which provides results of further assessment and camera trap monitoring for otter specifically within the survey area of the SAR, undertaken in the summer of 2024, in line with current guidance^{32, 33}.
- SAR Bat Activity Report³⁴, which provides results of bat habitat and preliminary roost assessments, and bat activity survey on buildings and structures along the SAR specifically, undertaken in summer of 2024, in line with current guidance³⁵.
- Invertebrate Scoping Survey Report³⁶ and Odonata Baseline Assessment Report³⁷, which provide results of baseline assessment and survey of invertebrates across the site, with specific focus on dragonflies (*Odonata spp.*) within the latter report, all of which was undertaken in the summer of 2024, in line with current guidance^{38, 39, 40}.
- Third-party Forestry Survey Report prepared by Upland Forestry Ltd, which provides results of baseline surveys of forestry within the site of the Proposed Development, as well as preliminary surveys and recommendations for woodland compensation and enhancement. This is included in Chapter 9: Forestry.
- Third-party Ornithological Survey Reports⁴¹ prepared by Mike Coleman Ecology, which provide results of three rounds of breeding bird surveys undertaken each year from 2022 to 2024, and one round of wintering bird surveys conducted over the 2023/24 season. This is included in Chapter 10: Ornithology.
- Third-party Aquatic Ecology Survey Report prepared by Gavia Environmental Consultancy, which provides results of baseline aquatic surveys undertaken in the 2024 season, involving macroinvertebrate surveys, macrophyte surveys, water quality monitoring, and fish habitat and

²² Strachan, Rob & Moorhouse, Tom. (2006). *Water Vole Conservation Handbook, Second Edition*.

²³ Dean, M., Strachan R. Gow, D. & Andrews, R. (2016). *The Water Vole Mitigation Handbook (The Mammal Society Mitigation Guidance Series)*. Eds: Fiona Mathews and Paul Chanin. The Mammal Society, London.

²⁴ Scottish Badgers: Surveying for Badgers – Good Practice Guidelines. Version 1: 2018. Available at: https://www.scottishbadgers.org.uk/userfiles/file/planning_guidelines/Surveying-for-Badgers-Good-Practice-Guidelines_V1.pdf

²⁵ Gurnell, J., Lurz, P., McDonald, R. & Pepper, H. (2009) *Practical Techniques for surveying and monitoring squirrels*. Forestry Commission Practice Note 11.

²⁶ Birks, J. (2012) Pine marten. In: Cresswell, W.J., Birks, J.D.S., Dean, M., Pacheco, M., Trehwella, W.J., Wells, D. and Wray, S. (2012). *UK BAP Mammals: Interim Guidance for Survey Methodologies, Impact Assessment and Mitigation*. The Mammal Society, Southampton

²⁷ J. D. S. Birks *et al.* (2012). UK BAP Mammals Interim Guidance for Survey. Methodologies, Impact Assessment and Mitigation. The Mammal Society

²⁸ Edgar, P., Foster, J. and Baker, J. (2010). *Reptile Habitat Management Handbook*. Amphibian and Reptile Conservation, Bournemouth

²⁹ Edgar, P., Foster, J. and Baker, J. (2010). *Reptile Habitat Management Handbook*. Amphibian and Reptile Conservation, Bournemouth

³⁰ Beebee TJC, Griffiths RA (2000) *Amphibians and reptiles*. HarperCollins, vol 270. New Naturalist, London

³¹ EnviroCentre (2024) Fearn SAR Otter Assessment and Monitoring Report.

³² Chanin, P. (2003). *Monitoring the Otter Lutra Lutra*. *Conserving Natura 2000 Rivers, Monitoring Series (No. 10)*. Peterborough: EN, CCW, EA, SEPA, SNH & SNIFFER.

³³ Bassett, S., & Wynn, J. (2010). *Otters in Scotland: How Vulnerable Are They to Disturbance?* CIEEM In Practice, (70), 19–22.

³⁴ EnviroCentre (2024) Fearn SAR Bat Activity Report.

³⁵ Collins, J. (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust.

³⁶ EnviroCentre (2024). Fearn Invertebrate Scoping Survey Report.

³⁷ EnviroCentre (2024). Fearn Odonata Baseline Assessment Report.

³⁸ Buglife. Available at: <https://cdn.buglife.org.uk/2019/07/Good-practice-planning-surveys.pdf>

³⁹ British Dragonfly Society. Dragonfly Survey Guidance. Available at: <https://british-dragonflies.org.uk/wp-content/uploads/2019/04/Survey-guidance.pdf>

⁴⁰ Good Planning Practice for Invertebrate Surveys (2019). Available at: <https://cdn.buglife.org.uk/2019/07/Good-practice-planning-surveys.pdf>

⁴¹ Mike Coleman Ecology (2022-2024) Technical Appendices 10.1.1-10.1.4 within Fearn PSH EIAR.

ecology surveys, undertaken between 2023 to 2024 across all watercourses/waterbodies within the site. This is included in Chapter 11: Aquatic Ecology.

- The following chapters from Volume 1 of the EIA Report, where methods of data collection and results are Chapter 6: Hydrology and Water Management, Chapter 8: Ecology, Chapter 10: Ornithology, Chapter 11: Aquatic Ecology, Chapter 12: Geology, Soils and Water.

Potential areas for ecological restoration and enhancement have been identified within the estates and holdings surrounding the site, with specific identification of areas for peatland, woodland, and aquatic restoration.

Desk-based and field survey work to identify suitable areas for peatland restoration across Forestry and Land Scotland (FLS) Glengarry Forest, as well as East and West Glenquoich Estates has been undertaken by ADL Nature Ltd (ADL). Areas were initially identified via desk study, utilising sources including the 2016 Carbon and Peatland Map⁴², NBN Atlas, and aerial imagery. Areas of potential suitability were then surveyed via walkover and drone surveys in 2024/25, to record the Phase 1 habitat types, and determine their suitability for restoration. Full details are contained within ADL's Phase 1 Overview/Peatland Restoration Assessment Report, provided in Appendix A.

Potential options for woodland restoration/creation and peatland restoration have also been identified by FLS within their Glengarry Forest holding, with this site selection informed by a combination of desk-based study reviews and where relevant, limited peat depth surveys. At the time of writing, no detailed scoping has been carried out for the majority coverage of the identified woodland restoration areas and further survey will be required to determine suitability for restoration. The peatland restoration opportunities within the FLS Estate are covered in the ADL Peatland Restoration Assessment Report at Appendix A.

⁴² 2016 Carbon and Peatland Map. Available at: <https://opendata.nature.scot/datasets/snh::carbon-and-peatland-2016-map/explore>

3 BASELINE DATA AND IMPACT ASSESSMENT SUMMARY

The following chapter presents a summary of baseline conditions of the site recorded during the site-wide UK Habitat Classification survey between May and June 2024. For full details on baseline conditions including habitats, condition assessments, invasive species and an assessment of importance, please refer to the previous reports for the site.

The full impact assessment is set out in the EIA Report; however, the key effects on the important ecological features are summarised in Sections 3.1 – 3.2 below.

3.1 Habitats

Based on the provided development boundary, which is inclusive of only areas where permanent vegetation removal is, a total of 180.44ha habitats of county-level importance or higher for which a significant effect is predicted would be permanently lost or temporarily affected as part of the Proposed Development.

In addition to the vegetation communities listed below, the Proposed Development would also result in the loss of a number of habitats assessed as having less than county-level ecological importance (i.e. not considered to be important ecological features), namely: coniferous plantation woodland, upland acid grassland (NVC community U4), bracken (U20), gorse scrub (W23), other inland rock, other developed land, modified grassland, and other Scot's pine woodlands.

Table 3-1: Summary of Habitat Losses (in hectares) and their Significance

Habitat	Total Loss (ha)	Significance of effect
Blanket Bog (H7130) (M17)	62.68	Significant at a Local level
Upland Flushes, Fens and Swamps (M25**, M1*, M3*, M6**, M10* **)	21.11	Significant at a Local level
European Dry Heath (H4030) (H14, H17)	1.83	Significant at a Local level
Northern Atlantic Wet Heaths with <i>Erica Tetralix</i> (H4010) (M15**)	82.13	Significant at a Local level
Nutrient-Poor Shallow Waters with Aquatic Vegetation on Sand (H3110) (A22)	10.16	Significant at a Local level
Upland Birchwoods*** (W4**, W17)	0.04	Significant at a Local level
Western Acidic Oakwoods*** (H91A0) (W11, W17)	2.03	Significant at a Local level
Caledonian Pine Forest*** (H91C0) (W18) and Native Pinewoods*** (W18)	0.46	Significant at a Local level

*Habitats with unknown area are generally isolated, small, or occurring as a component of other NVC habitats. These habitats occur across the study area but are not feasible to map individually and an area estimate has not been provided.

**These NVC communities are potential Groundwater Dependent Terrestrial Ecosystems (GWDTE).

*** These woodland habitats form part of the 7 hectares of woodland recorded in the Ancient Woodland Inventory that will be lost due to the Proposed Development. However, it is important to note that Ancient Woodland Inventory polygons are not always precise and may encompass areas of Plantations on Ancient Woodland Sites (PAWS) or unwooded habitat, which contribute to the total 7 hectare.

3.2 Faunal Species

Table 3-2 summarises the species or species groups for which field evidence and/or suitable habitat was identified within the site, and which have been further assessed as being of local importance or higher, and/or are legally protected. The potential significant effects on these receptors, following the application of appropriate mitigation and good practice measures, are also summarised in Table 3-2.

Table 3-2: Evaluation of Protected Species Receptors, Including Potential Significant Effects

Receptor	Evaluation	Potential Significant Effects
Bats: common pipistrelle (<i>Pipistrellus pipistrellus</i>), soprano pipistrelle (<i>Pipistrellus pygmaeus</i>), brown long-eared bat (<i>Plecotus auritus</i>), Daubenton's bat (<i>Myotis daubentonii</i>)	Non-significant	No significant effects (small-scale habitat loss is insignificant).
Badger	Non-significant	No significant effects (small-scale habitat loss is insignificant).
Otter	Significant at local level	Vehicle traffic risks. Localised losses of suitable habitat and temporary displacement at new water crossings (although not significant following best practice and appropriate mitigation measures).
Water vole	Non-significant	No significant effects
Pine marten	Significant at local level	Vehicle traffic risks. Localised linear losses of suitable habitat and temporary displacement specifically along the SAR (although not significant following best practice and appropriate mitigation measures)
Red squirrel	Significant at local level	Vehicle traffic risks. Localised linear losses of suitable habitat and temporary displacement specifically along the SAR (although not significant following best practice and appropriate mitigation measures)
Mountain hare	Non-significant	No significant effects for this mobile species (extensive suitable habitat remains available in wider locale despite losses within the site).
Red deer	Non-significant	No significant effects (extensive suitable habitat remains available in wider locale for this highly mobile species despite losses within the site). Displacement and subsequent shift in browsing pressure on surrounding habitats to be considered through further consultation.
Amphibians: Common toad (<i>Bufo bufo</i>)	Significant at local level	Loss of suitable amphibian habitat, representing significant losses for amphibian species with small territorial ranges and limited dispersal ability.
Reptiles: slow worm (<i>Anguis fragilis</i>), common lizard (<i>Zootoca vivipara</i>), adder (<i>Vipera berus</i>)	Significant at local level	Loss of suitable reptile habitat, representing significant losses for reptile species with small territorial ranges and limited dispersal ability.
Invertebrates: argent and sable (<i>Rheumaptera hastata</i>), broom moth (<i>Ceramica pisi</i>), large heath butterfly (<i>Coenonympha tullia</i> ssp. <i>scotica</i>), moss carder bee (<i>Bombus muscorum</i>), billberry bumblebee (<i>Bombus monticola</i>), Northern dart (<i>Xestia alpicola</i>), small heath butterfly	Significant at local level	Loss of at least of locally-important invertebrate habitat, representing significant losses for invertebrate species with small territorial ranges and limited dispersal ability.

Receptor	Evaluation	Potential Significant Effects
(<i>Coenonympha pamphilus</i>), small pearl-bordered fritillary (<i>Boloria selene</i>)		
Odonates: azure hawker (<i>Aeshna caerulea</i>), Northern emerald (<i>Somatochlora arctica</i>), white-faced darter (<i>Leucorrhinia dubia</i>).	Significant at regional level	Loss of suitable odonate habitat and an identified population stronghold for azure hawker, representing a significant loss for this species at the county-level, and other nationally-scarce species at the local-level.
Birds	Non-significant	No significant effects for the breeding or wintering bird assemblages identified within the locale. Extensive suitable habitat within the locale for moorland-associated species. Losses of woodland are localised and small-scale for associated species. Loch Fearn has notably been utilised by low numbers of Common Scoter (<i>Melanitta nigra</i>) and Black-throated Diver (<i>Gavia arctica</i>) for foraging purposes (no breeding recorded); however, suitable alternative foraging sites are present in the locale.
Fish	Non-significant	No significant effects. Loch Fearn and watercourses within the Coires Dubh and Ghlas, which are to be lost within the Proposed Development, do not support fish populations of any significance, largely due to the series of natural and artificial barriers that restrict fish movements. Only localised impacts predicted at proposed bridge sites along the SAR.
Aquatic macroinvertebrate	Significant at local level	Loch Fearn supports a high diversity and abundance of macroinvertebrate species, common to the locale and Scotland, and therefore the loss of this waterbody and adjoining watercourses is considered to be significant at the local scale.

3.3 Restoration Areas

This section should be considered in conjunction with the Compensatory and Biodiversity Enhancement Plan - Figure 8.7.1.

Several restoration areas outwith the site boundary have been identified, as required for compensatory habitat restoration based on the total loss of all existing habitat coverage within the proposed working area of the site. These restoration areas are present within surrounding land holdings, specifically the East and West Glenquoich Estates and the FLS Glengarry Forest.

At the time of writing, existing information on the baseline survey/condition and scoping of restoration feasibility is only partially available across these restoration sites, specifically for the peatland restoration sites, with further consultation and baseline survey required to inform this OBEMP.

These potential restoration areas have been broken down by habitat type below.

3.3.1 Peatland Restoration Areas

Potential peatland restoration areas have been identified across East and West Glenquoich Estates and FLS Glengarry Forest. Assessment of these sites, inclusive of Phase 1 habitat surveys and restoration feasibility assessments, have been conducted across all sites, by a third-party, ADL Nature Ltd, between 2024 to 2025. The total field survey area covered 1317ha of actionable (restorable) peatland across all sites (out of 26,775ha across all ownership boundaries), inclusive of 50m buffers surrounding all restoration areas, which indicate adjacent areas that will be positively impacted by restoration within core areas. The suitability of these sites for restoration considered the following factors:

- Access for excavators, argocats, tracked dumper etc.;
- Current and projected herbivore impacts;
- Type of habitat and its potential for long term regeneration;
- Potential to link impacts into drainage catchments by restoring at scale;
- Proximity to current deer fencing;
- Any potential impacts to archaeological structures;
- Understanding of peat slide risk;
- Potential to meet current guidance for peatland code/IUCN structures;
- Bird nesting;
- Any sensitive ecological areas;
- Water voles; *and*
- Peat depth.

Results of these assessments are summarised below, with further detail on baseline condition, peat depth estimations, herbivore impact assessments, and exact locations of these potential restoration sites are depicted in Appendix A.

East Glenquoich Estate

A total of 24 sub-sites containing degraded peatland have been identified and assessed within the East Glenquoich Estate boundary, totalling 876.5ha of degraded peatland. Full coverage peat depth surveys have been conducted across these sub-sites and the peatland identified has been classified based on condition under three categories: 'actively eroding – flat bare and hag/gully', 'drained – hag/gully', and 'modified'.

Within the third-party assessment, up to 319ha in total, out of 876.5ha, were identified as restorable peatland (including the 50m buffer); however, significant access issues were noted for these restoration sites, namely that some sites were over 4km from primary access points, with steep terrain restricting access for tracked vehicles. As such, based on these restrictions, these sites were not considered entirely feasible for restoration and therefore not recommended as primary restoration areas.

West Glenquoich Estate

Three phases of ongoing/future potential peatland restoration sites have been identified and assessed within the West Glenquoich Estate boundary, totalling 452ha of peatland. The first phase of peatland restoration has been completed, equalling 57ha, with a remaining 395ha of potential restoration sites across the two remaining phases. An additional 168ha of potential peatland restoration has also been identified adjoining the Phase 1 and Phase 2 restoration areas, totalling 563ha.

Within the third-party assessment, up to 441ha in total, out of 563ha, were identified as actionably restorable peatland (including the 50m buffer); however, significant access issues were noted, as well

as notably elevated deer impacts within some areas, which, in the absence of deer control measures (which have not currently been proposed across this estate), would restrict the feasibility of restoration. As such, based on these restrictions, these sites were not considered entirely feasible for restoration and therefore not recommended as primary restoration areas.

FLS Glengarry Forest

Initially, a total of five potential peatland restoration areas were identified within the FLS Glengarry Forest ownership boundary, split across three areas: FLS Clunes, FLS Greenfield Farm, and FLS Glengarry, totalling 1630ha of peatland (this figure was calculated prior to any detailed scoping, with only minimal peat depth surveys having been conducted).

Within the third-party assessment, which provided the required Phase 1 surveys and restoration feasibility assessments across these three areas, up to 511ha out of the initial 1630ha, were identified as actionably restorable peatland (including the 50m buffer). In contrast to the potential restoration areas identified within East and West Glenquoich Estates, the 511ha of restorable peatland across FLS Glengarry Forest are considered to be the most suitable restoration sites, based on ease of access, an appropriate deer management policy (inclusive of exclusionary fencing and density reduction culling), and the presence of suitable blanket bog vegetation. As such, these three areas across FLS Glengarry Forest have been recommended as the primary restoration areas.

Loch Quoich – SSE

Potential peatland restoration areas have been identified within the SSE ownership boundary of Loch Quoich, specifically land above the normal high-water level, but below the spill/flood level. These areas for restoration are characterised by severely degraded peatlands and could potentially act as recipient sites for peat removed from the footprint of the proposed Loch Fearn reservoir, subject to control on deer impacts within these highly sensitive restoration areas.

3.3.2 Woodland Restoration/Creation, Rhododendron Control, and Deer Exclusion Areas

Potential woodland restoration areas have been identified across East and West Glenquoich Estates and FLS Glengarry Forest. At the time of writing, no detailed scoping assessments, specifically regarding restoration feasibility and condition of existing woodlands, have been conducted. These assessments will be required to refine woodland restoration zoning and planting proposals, post-consent, to determine the full feasible extent of restoration. At this stage, baseline habitat data and condition assessments are partially available for the identified woodland restoration sites, where they intersect the survey areas of the SAR and PSH, as detailed within the corresponding reports^{15,16,20}.

Initial summaries of each potential woodland restoration area within the respective land holdings are detailed below, based on the information available at the time of writing, including baseline habitats and condition, estimated coverage, and approximate/generalised locations.

East Glenquoich Estate

The proposed woodland restoration/creation sites within the East Glenquoich Estate are centred along the riparian zones of the Gearr Garry and River Kingie. These zones being characterised by open mosaic of heathland and bog habitats, as well as stands of non-native conifer plantation (particularly surrounding the River Kingie), and a near absence of native riparian woodland, with the exception of three parcels of remnant ancient semi-natural woodland to the north-east/-west of Kingie Pool. Two of these parcels are classified as 'ghost woodlands', which are characterised by ancient woodland parcels that have lost 80% of tree cover and are at risk of disappearance.

Management prescriptions would include the establishment of large deer exclusion areas along the riparian corridor of these watercourses, inclusive of all ancient woodland remnants, with additional space for direct woodland creation in conjunction with wider regeneration facilitated by the release from browsing pressures. . At the time of writing, the exact coverage/zoning of these habitat management prescriptions across the proposed areas, and the respective feasibility of restoration, has not been through a detailed scoping assessment.

West Glenquoich Estate

The proposed woodland restoration/creation site within the West Glenquoich Estate is centred on the northern shore of Loch Quoich, extending from Allt Fearnna in the east to Allt Coire Peitireach in the west, covering over 2km. The section of this site between Allt a' Mheil and Allt Coire Peitireach is characterised by existing semi-native woodland cover, extending along the shore of Loch Quoich to encompass the riparian zones of these adjoining watercourses. The riparian woodlands of Allt a' Mheil specifically are classified with the AWI as 'Long-Established woodlands of Plantation Origin' (LEPO). To the east of Allt a' Mheil, the ground opens up into heathland habitats extending through to Allt Fearnna, the riparian zone of which is characterised by an over-dominance of bracken (*Pteridium aquilinum*) and sparse coverage of birch trees. The whole area surrounding the old Glenquoich Lodge is shown as well-wooded on the first edition Ordnance Survey maps in the 1860's, much of it within a large enclosure and with other areas of unenclosed ancient semi-natural wood-pasture on the hillsides.

These mixed ancient semi-natural and planted woodlands are further characterised by an extensive, well-established invasion *Rhododendron ponticum* an Invasive Non Natural Species (INNS) that dominates the understorey of these habitats, with notably mature stands present surrounding both Allt a' Mheil (throughout the ancient LEPO woodlands) and Allt Coire Peitireach, as well as along the C1144 road extending parallel to Loch Quoich shoreline. Extending out from this mature seed source, INNS rhododendron has also been noted encroaching into the surrounding heathland, reaching elevations of +500m within both Coire Peitireach and Coire Dubh, extending in total across an area greater than 100ha.

Management prescriptions would include removal of *Rhododendron ponticum* at a landscape, combined with new native woodland creation and restoration of existing woodland remnants within a large enclosure or enclosures designed to tie in closely with the core development of the PSH scheme itself.

To protect planted trees and allow for natural regeneration across the wider non-wooded restoration area). At the time of writing, the exact coverage/zoning of these habitat management prescriptions across the proposed areas, and the respective feasibility of restoration, has not been through a detailed scoping assessment.

FLS Glengarry Forest

The proposed woodland restoration/creation sites within the FLS Glengarry Forest are situated entirely within the riparian zones of the River Garry, Loch Poulary, Loch Garry, and smaller tributaries, including Allt Choire a' Bhalachain and Allt Fionn-dhail, comprising a total potential restoration area of approximately 171ha. These restoration areas are currently characterised by a mosaic of open heathland and bog habitats, as well as non-native conifer plantation (at varying stages of rotational management), with small remnants of native riparian woodlands.

An additional potential site for restoration of Annex I Caledonian pine forest has been identified, as detailed in Figure 8.7.1, comprising a core area of existing pinewoods, extending through the riparian zone of the Allt Garaidh Ghualaich, covering 4.6ha, and the surrounding regeneration zone of an additional 27.2ha, totalling 31.8ha. The surrounding regeneration zone is largely comprised of open

heathland, with areas of semi-native woodland regeneration adjoining the core pinewood zone and surrounding non-native conifer plantation.

Over the next 6-36 months, FLS plans, subject to adequate financing, to secure the FLS Glengarry Forest block from deer migration through the upgrading and installation of deer exclusionary fencing, to maintain the coverage of the historic, now defective, deer exclusion area. This will be conducted in conjunction with higher cull rates over several years in order to facilitate the woodland and riparian habitat enhancements. In addition to these third-party efforts, the proposed management prescriptions include the removal of self-seeded non-native tree species (namely Sitka spruce and Lodgepole pine) (particularly within the above-mentioned Caledonian pinewood regeneration zone site) and subsequent restoration of Plantation on Ancient Woodland Sites (PAWS) within the Caledonian Pinewood Inventory (CPI) buffer and other ancient woodland sites.

At the time of writing, the exact coverage/zoning of these habitat management prescriptions across the proposed areas, and the respective feasibility of restoration, has not been through a detailed scoping assessment. To further note, for riparian restoration areas to the south of Loch Poulary and the River Garry, further habitat survey is required to identify suitable Common Scoter habitat and subsequently define woodland creation areas along this corridor, potentially reducing the net area for riparian woodland restoration.

3.3.3 Aquatic/Riparian Enhancements (Non-Woodland Habitats)

A series of potential smaller-scale restoration areas have been proposed targeting several waterbodies and surrounding riparian zones across East Glenquoich Estate, FLS Glengarry Forest, and within the SSE ownership boundary of Loch Loyne, including Kingie Pool, Loch Poulary, Lochan na Staic, Loch Garry, and Loch Loyne with a specific focus on breeding habitat restoration/creation for Common Scoter. The restoration efforts will primarily involve localised heathland restoration for nesting, along with the establishment of sparse willow and wet woodland cover where feasible. The scale and precise locations of the associated habitat management prescriptions will be determined through further consultation with the Royal Society for the Protection of Birds (RSPB), as well as through further survey of potential sites.

Partial baseline habitat data is available for Kingie Pool and Lochan na Staic where these waterbodies intersect the survey area of the SAR¹⁶, which demonstrates that the surrounding terrestrial habitats are partially composed of wetland communities, specifically NVC communities M25, M17, and M29, with the aquatic macrophyte community A22 within Lochan na Staic itself. Much of the ground surrounding the loch comprises clear-felled (and largely re-stocked) forestry plantation.

4 BEMP WORKING GROUP AND REVIEW

A group of key stakeholders in the BEMP would be invited to form a BEMP working group, their role would be to provide input into and comment on the detailed BEMP and subsequent revisions to the BEMP during the lifetime of the Proposed Development.

It is envisaged that the working group would include the following stakeholders:

- The Developer (Fearn PSH Ltd) and their ecological advisor(s);
- The landowner(s) – East and West Glenquoich Estates, FLS, SSE Generation;
- The Highland Council (THC);
- NatureScot;
- Scottish Environmental Protection Agency (SEPA);
- Ness District Salmon Fishery Board (NDSFB); *and*
- The RSPB.

Further details, including terms of reference for the BEMP working group, would be provided in the detailed BEMP, post consent.

The BEMP would be reviewed and updated on a regular basis, based on monitoring of progress toward achieving its goals and objectives and to inform active management. Proposed review timescales are set out in Table 7-1.

As the Developer, Fearn PSH Ltd is ultimately responsible for meeting the commitments made in this OBEMP. The implementation of the final BEMP would be undertaken by suitably experienced contractors and all monitoring would be undertaken by suitably qualified and experienced environmental professionals.

5 OUTLINE BIODIVERSITY AND ENHANCEMENT MANAGEMENT PLAN

5.1 Scope and Vision

The geographical scope of the BEMP covers the site and areas of surrounding holdings – the East and West Glenquoich Estates, FLS Glengarry Forest and land owned by SSE Generation. A rationale for the extent and location of proposed BEMP areas is provided in Section 5.3.

The overall vision of the OBEMP is to enhance/restore the extent and condition of target habitats within the proposed BEMP areas.

5.2 Targets

Table 5-1 below details the species and habitats (features) that will be targets of the BEMP, which will benefit from the management prescriptions. A rationale for their inclusion as targets is also provided. Associated objectives, outlined in Table 5-2, are included for reference.

The features which form the targets of this BEMP have been determined through consideration of the relative importance of ecological features present at the site, the extent to which they may be affected by the Proposed Development (as established in the EIA Report), their potential to benefit from restoration or management, local biodiversity priorities within the Highland Nature Biodiversity Action Plan (HNBAP) , and national biodiversity priorities.

Table 5-1: BEMP Targets, Rationale and Management Prescription Outline

Management Prescription	Benefitting Feature	Rationale	Relevant Objectives (see Table 5-2)
Peatland restoration, including bog pool creation	Blanket bog, odonates	Peatlands are characterised by a variety of vegetation types, most notably as blanket bog habitats in the Scottish uplands. Scotland's National Peatland Plan (SNPP) ⁴³ recognises the importance of peatlands for biodiversity and water quality, as well as a carbon store. Under the EU Habitats Directive, blanket bog (and raised bog) is classified as an internationally-important Annex I habitat, with this habitat being further listed on the SBL ⁴⁴ , as well as prioritised within the HNBAP (as part of the Peatland and Wetland Habitat Action Plan). Peatland restoration is further prioritised under Policy 5 of NPF4, with a recommended compensation ratio from NatureScot of 1:10 (lost to restored) ⁴⁵ .	1.1, 1.2, 6.1

⁴³ SNH (2015). *Scotland's National Peatland Plan – Working for our future*. Available at: <https://www.nature.scot/doc/scotlands-national-peatland-plan-working-our-future>

⁴⁴ NatureScot (2023). *Scottish Biodiversity List*. Available at: <https://www.nature.scot/doc/scottish-biodiversity-list>

⁴⁵ NatureScot (2023). *Advising on peatland, carbon-rich soils and priority peatland habitats in development management*. Available at: <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>

Management Prescription	Benefitting Feature	Rationale	Relevant Objectives (see Table 5-2)
		As such, with blanket bog considered to be a priority habitat at the county through to international level, and based on the predicted scale of loss/degradation of this habitat as a result of the Proposed Development, this habitat forms a core aspect of this OBEMP. Peatland restoration works, specifically where inclusive of bog pool creation, is likely to directly benefit breeding odonates on the British Odonata Red List 2008, including azure hawker (<i>Aeshna caerulea</i>), northern emerald (<i>Somatochlora arctica</i>), and the nationally-rare white-faced darter (<i>Leucorrhinia dubia</i>). Blanket bog habitat surrounding Loch Fearn was identified as an important site of potential regional significance for azure hawker. As such, based on the predicted loss of this breeding habitat within the Proposed Development boundary, compensatory bog pool creation as part of wider peatland restoration works will be required. In conjunction with this restoration, a translocation programme of odonatan eggs and larvae should also be considered. In addition to odonates, peatland restoration works are also likely to benefit HNBAP priority species/SBL/BoCC Red-List⁴⁶ ⁴⁷species, including Golden Plover (<i>Pluvialis apricaria</i>), Snipe (<i>Gallinago gallinago</i>), Greenshank (<i>Tringa nebularia</i>), Dunlin (<i>Calidris alpina</i>), Black Grouse (<i>Tetrao tetrix</i>), and Ptarmigan (<i>Lagopus muta</i>), as well as amphibians, reptiles, and other invertebrate species.	
Woodland restoration/ - including removing invasive <i>Rhododendron ponticum</i> , reducing herbivore impacts to allow natural regeneration and improvements in woodland structure, and removing non-native conifer regeneration within ancient woodland habitats	Native woodland BAP Priority Habitats (Upland Birchwoods, Native Pinewoods, and Upland Oakwoods)	The Woodland and Forest Habitat Action Plan (HAP) of the HNBAP details a commitment to the protection, regeneration, and restoration of native woodlands, with an equivalent commitment made under Policy 6 of NPF4 for forests, woodland, and trees. The Proposed Development will result in the permanent loss of around 25 ha of existing forests and woodlands, predominantly planted non-native conifers but also including small areas of ancient semi-natural woodland.	2.1, 4.2

⁴⁶ Birds of Conservation Concern information available at: <https://www.bto.org/sites/default/files/publications/bocc-5-a5-4pp-single-pages.pdf>

⁴⁷ **Red-list criteria** - Globally threatened, historical decline in the breeding population, severe breeding population decline over 25 years/longer term, severe non-breeding population decline over 25 years/longer term, severe breeding range decline over 25 years/longer term, severe non-breeding range decline over 25 years.

Management Prescription	Benefitting Feature	Rationale	Relevant Objectives (see Table 5-2)
		As such, a combination of new native woodland creation and active woodland restoration activities is proposed to provide a significant biodiversity enhancement. This compensation is a requirement under the Scottish Government's Control of Woodland Removal Policy⁴⁸. Significant remnants of Native Pinewood BAP Priority Habitat are present throughout Glengarry Forest, which forms one of the remaining 34 native Caledonian pinewood sites in Scotland. The Caledonian Pinewood Recovery Project identified the south-west range of this nationally-scare habitat, inclusive of Glengarry, as the most threatened across this range and with the poorest health and resilience, based on herbivore impacts, fragmentation, and absence of structural/species diversity⁴⁹. As such, where feasible, woodland restoration will prioritise Caledonian pine forest and adjoining ancient woodland sites, including the following specific measures: 1. the removal of non-native trees within established regeneration zones, 2. the removal and control of invasive <i>Rhododendron ponticum</i> at a landscape scale around Loch Quoich 3. reduction of herbivore impacts upon ancient woodland remnants to allow for natural regeneration Woodland restoration works are also likely to benefit HNBAP priority species/SBL/BoCC Red-list species including Lesser Redpoll (<i>Acanthis cabaret</i>), Black Grouse, Cuckoo (<i>Cuculus canorus</i>), Crested Tit (<i>Lophophanes cristatus</i>), Crossbill (<i>Loxia curvirostra</i>), Tree Pipit (<i>Anthus trivialis</i>), Mistle Thrush (<i>Turdus viscivorus</i>), and Spotted Flycatcher (<i>Muscicapa striata</i>), as well as as well as red squirrel, pine marten, otter, and other invertebrate species	
Compensatory Planting	Native woodland BAP Priority Habitats (Upland Birchwoods, Native Pinewoods, and Upland Oakwoods)	The Proposed Development will result in the permanent loss of around 25 ha of existing forests and woodlands, predominantly planted non-native conifers but also including small areas of ancient semi-natural woodland.	2.2, 4.2

⁴⁸ Forestry Commission. *The Scottish Government's Policy on Control of Woodland Removal*. Available at: <https://www.forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal/viewdocument/285>

⁴⁹ Trees for Life (2023). *Caledonian Pinewoods – Findings from the Caledonian Pinewood Recovery Project*. Available at: <https://treesforlife.org.uk/wp-content/uploads/2023/02/Caledonian-Pinewood-Recovery-Final-Report-Feb-2023.pdf>

Management Prescription	Benefitting Feature	Rationale	Relevant Objectives (see Table 5-2)
		Compensatory Planting of at least an equivalent area to that of the woodland loss is a requirement under the Scottish Government's Control of Woodland Removal Policy⁵⁰. Native woodland creation proposals equivalent to at least 100 ha will be developed as part of the BEMP.	
Deer management	Upland habitat assemblage: wet and dry heath, blanket bog, upland flushes fens and swamps, woodland, acid grasslands.	The high density of deer and associated high herbivore impacts over-browsing pressures represent a significant limiting factor on natural regeneration of woodland, scrub, and heathland, subsequently reducing the longevity, coverage, and integrity of these habitats, with further erosion/degradation within sensitive habitats, including blanket bogs, through trampling. SNH [NatureScot] Research Report 1149 (2019)⁵¹ estimated red deer densities within the East Knoydart and Glenelg Deer Management Areas (DMA), which encompass the Proposed Development and restoration areas, at between 8.1-11 deer/km² and 11.1-15 deer/km², respectively. FLS have proposed installation of new deer exclusionary fencing to encompass all native woodland restoration areas, as well as reducing deer density to 4 deer/km². Reduction in deer densities and the creation of exclusion areas represents the most substantial, feasible, and location-appropriate opportunity for benefitting a wide range of high value and sensitive upland habitats, including several Annex I habitats, at a significant landscape scale. Controls of herbivory would directly facilitate woodland and peatland restoration objectives.	1.1, 2.1, 2.2, 2.3, 3.1
Watercourse and aquatic/ riparian enhancement	Watercourse and aquatic/riparian zones, fish (including Atlantic salmon (<i>Salmo salar</i>), brown trout (<i>Salmo trutta</i>), and , bird species (including Common Scoter),	The West Inverness-shire Lochs SPA is designated for breeding Black-throated Diver and Common Scoter; however, the existing breeding population, specifically of Common Scoter, is at risk of disappearance, as a result of the loss of breeding habitat and predation, with a small and diminishing number of breeding pairs remaining in the locale. Non-breeding Black-throated Diver and Common Scoter are also known to utilise Loch Fearn itself.	4.1, 4.2, 4.3, 4.4, 4.5, 5.1, 5.2, 5.3

⁵⁰ Forestry Commission. *The Scottish Government's Policy on Control of Woodland Removal*. Available at: <https://www.forestry.gov.scot/publications/285-the-scottish-government-s-policy-on-control-of-woodland-removal/viewdocument/285>

⁵¹ SNH (2019). Research Report No. 1149. *Updating the estimates of national trends and regional differences in red deer densities on open-hill ground in Scotland*. Available at: <https://www.nature.scot/sites/default/files/2019-11/A3115490.pdf>

Management Prescription	Benefitting Feature	Rationale	Relevant Objectives (see Table 5-2)
	otter, and aquatic invertebrates	As such, the predicted loss of suitable habitat within and surrounding Loch Fearna will require compensatory riparian restoration in the wider locale, with potential restoration sites identified at Kingie Pool, Loch Poulary, and Lochan an Staic. A restoration programme that seeks to maximise the benefits for breeding Common Scoter across the locale at each of these restoration sites, would represent a significant enhancement for this nationally-rare BoCC Red-list breeding bird, beyond the necessary compensation, and would support the Conservation Objectives of the West Inverness-shire Lochs SPA. Whilst suitable fish habitat was identified in Loch Fearna and the surrounding watercourses of Coires Ghlas and Dubh, no fish populations were identified within this suitable habitat, likely due to barriers to fish movements downstream (including both natural and artificial barriers). That Loch Fearna is fishless is acknowledged by the NDSFB and local ghillies. In line with the rationale for woodland restoration/ creation, targeted riparian planting and measures that allow for natural woodland regeneration along Gearr Garry and the River Kingie, where only sparse remnant tree cover is present, would over the long-term provide potential spawning habitat for Atlantic salmon and other salmonids by increasing shading, lowering water temperatures, and depositing woody debris. These enhancement works would also support the Upper Garry Salmon Restoration Project. Watercourse and aquatic/riparian enhancements are also likely to benefit a range of other species, including European Protected Species (EPS)/HNBAP priority species/SBL species, including otter, Wood Sandpiper, Greenshank, Dipper (<i>Cinclus cinclus</i>), and Black- and Red-throated Divers, as well as other fish species and aquatic macroinvertebrates.	
Invasive Non-Native Species (INNS) control, specifically <i>Rhododendron ponticum</i>	All habitats hosting INNS, particularly native woodlands	Extensive coverage of INNS rhododendron across the riparian corridor of Eas Allt a' Mheil and adjoining LEPO woodlands to the south-west of Loch Fearna has been identified, with notably significant spread within surrounding heathlands, including through to high elevations (500m+) within Coires Dubh and Peitireach, as	7.1

Management Prescription	Benefitting Feature	Rationale	Relevant Objectives (see Table 5-2)
		well as the woodlands through to Allt Coire Peitireach. This species is listed under Schedule 9 of the Wildlife and Countryside Act, and it is an offence under the Wildlife and Countryside Act 1981, as amended by the Wildlife and Natural Environment (Scotland) Act 2016, to plant or cause to grow in the wild any plant outwith its native range or to allow a non-native species that is not exempt or licensed to spread into the wild. Rhododendron is a frequent component of native woodlands across the western highlands, typically associated with Policy Woodlands around big houses (such as the former Glenquoich Lodge, now submerged). Along with high herbivore impacts, the presence of Rhododendron ponticum is one of the main negative pressures upon ancient woodlands – where it can lead to significant loss of the rare lichens and bryophytes for which these temperate rainforest habitats are internationally significant. The Presence of mature stands can act as a significant source population for invasion across extensive areas of land. [Additionally, rhododendron can act as a vector for the <i>Phytophthora</i> pathogen, such as <i>P. ramorum</i> and <i>P. kernoviae</i>, which poses a serious threat to native flora, including oak, alder, and heathland species, by causing widespread disease outbreaks.]? As such, any INNS control should seek to eradicate invasion sources and prevent continued encroachment into new habitats.	
Erection of artificial nest/roost boxes	Bat species, bird species	Installation of bat boxes within existing mature woodland edge habitat, along riparian corridors, and on existing/ new bridges along the SAR would enhance roosting opportunities for a range of bat species across the locale. Dependent on the design of new watercourse bridges, where ledges suitable for nesting are not present on the underside of the bridge deck, artificial nest boxes specifically for Dipper and Wagtails (<i>Motacilla spp.</i>) would be installed to compensate for the loss of nesting opportunities.	9.1
Installation of floating nesting rafts/islands	Common Scoter, Black-throated Diver and Red-	Creation of floating vegetated islands on suitable waterbodies within the locale, potentially including Kingie Pool, Loch Poulary, Lochan an Staic, Loch Garry, Loch Loyne, as	5.1

Management Prescription	Benefitting Feature	Rationale	Relevant Objectives (see Table 5-2)
	throated Diver (<i>Gavia stellata</i>)	well as Lochan Bad an Losguin and Lochan Dubha, could encourage more breeding pairs to take up residence, to reverse declines in the existing population. These nesting islands would specifically aid in the reduction of nest predation that threatens the Common Scoter in the locale. This provision would be carried out in consultation with the RSPB.	

5.3 Rationale for the Extent and Location of Habitat Restoration and Management Proposals

The following sections detail the rationale for the extent of habitat restoration and management proposed for compensation and enhancement, and their locations. Justification for restoration approaches is also provided where relevant.

5.3.1 Bog Compensation

Blanket bog was identified predominantly across the inundation zone and access hill track of the main PSH area of the Proposed Development, with the total area of bog habitat that is to be directly or indirectly affected totalling 63ha, inclusive of predicted losses along the SAR. Of this, approx. 69% was assessed to be in good condition, with the remaining 31% in moderate condition.

These loss calculations are based on the precautionary assumption that indirect loss of bog habitats represents a permanent, irreversible negative effect, although in practice some areas indirectly affected may be able to be restored, e.g. during reinstatement following construction. It is also based on the assumption that bog habitats within 30m of infrastructure would be indirectly affected from drying effects, in accordance with NatureScot guidance.

Current NatureScot guidance recommends a compensation ratio in the order of 1:10 in terms of blanket bog restoration, with additional restoration required for enhancement (in the region of an additional 10% of the baseline assessment if the extent of priority peatland habitat) to comply with NPF4 guidance⁴⁵, although it is understood that the NatureScot guidance is likely to be revised in the future⁵². On this basis, it is proposed to restore 640ha of peatland as part of the BEMP.

Areas of blanket bog with potential for restoration across East and West Glenquoich Estates and FLS Glengarry were investigated by (ADL) for peatland restoration suitability (see Appendix A).

The total area identified by ADL as actionably restorable peatland through Phase 1 survey and restoration feasibility assessment, across all relevant land holdings, totals 1,317ha, inclusive of 50m buffers surrounding all restoration sites, as discussed in Section 3.3.1. This includes 397.09ha (of core

⁵² As indicated at the Scottish Renewables Onshore Wind and Planning and Consents Forum on 2nd November 2023, where it was noted that the guidance was produced without consultation, and is proving to be unworkable for the renewable energy industry. It was also noted at the Forum that during a meeting of the Scottish Government's Peatland Advisory Group, on 31st October 2023, NatureScot accepted that the guidance should be revised.

areas, excluding the 50m buffer) of ground cover that have been directly surveyed in the field and classified as blanket bog habitat types, including the following:

- Flush and spring (E2) – 0.01 ha
- Bare peat (E4) – 3 ha
- Sphagnum bog (E1) – 3 ha
- Blanket sphagnum bog (E1.6.1) – 20 ha
- Raised bogs (E1.6.2) – 0.3 ha
- Wet modified bog (E1.7) – 324 ha
- Dry modified bog (E1.8) – 50ha

The remaining 919.09ha of potentially restorable peatland were identified through desk-based review of available peatland classification data, peat depth data, and aerial mapping.

Of the directly restorable peatland identified across all relevant holdings:

- Approximately 511ha within FLS Glengarry Forest (split across three areas: FLS Clunes, FLS Greenfield Farm, and FLS Glengarry) has been deemed the most suitable for restoration in its current form, and recommended as the primary restoration areas, based on ease of access, appropriate proposed deer management policy, and existing vegetation being of a high quality for restoration. Approx. 125ha of this primary restoration area within FLS Clunes is situated at an elevation of over 600m.
- Up to 319ha within East Glenquoich Estate, some of which has significant access restrictions and is associated with significant distances to primary access points and steepness of surrounding terrain, specifically for tracked vehicles.
- Up to 441ha within West Glenquoich Estate some of which has significant access restrictions and elevated herbivore impacts.
- Up to 25ha with opportunity for the beneficial use of excess peat from the PSH area within the West Glenquoich Estate and SSE Generation landholdings around the north west end of Loch Quoich.

It is proposed that the specific areas to be restored, to total 640ha, would be finalised at the detailed BEMP stage, informed by further survey work and risk assessment (see Section 5.5.1).

Selection and delivery of the bog restoration areas taken forward in the BEMP would take a balanced view of the sites, taking into account: time of year, current deer movements/hefts; future deer movements/hefts in response to active management strategies; and general condition of the site. The restoration work would also be informed by an up-to-date Habitat Impact Assessment (HIA)⁵³ (see Sections 5.5.1 and 8.0 for further details on survey work and monitoring).

Whilst a large area of actionably restorable peatland is present across all identified sites (totalling 1,317ha), inclusive of primary, second, and tertiary areas; the proposed peatland restoration focuses on those primary areas that have the most robust deliverability and the highest chance of success, within the confines of the proposed approach to deer management, specifically within FLS Glengarry Forest. This proposal has the benefit of being easier to control, with greater certainty about the overall outcome, and it would diversify the outputs of the restoration.

Although the complete success of all restoration areas can never be guaranteed in any bog restoration scheme, the bog restoration areas proposed within this OBEMP incorporate areas that are deemed to have good deliverability and a high chance of restoration success, based upon survey data,

⁵³ MacDonald A., Stevens, P., Armstrong, H., Immirzi, P., Reynolds, P. (1998) *A guide to upland habitats surveying land management impacts*. ISBN 85 397 296 7

recognised techniques, and the experience of the peatland restoration specialists (ADL, see Appendix A).

5.3.2 Non-Bog Terrestrial and Aquatic Habitat Compensation and Enhancement

The following sections describe the rationale for the areas and locations proposed to provide both habitat compensation, and significant enhancement, for a variety of non-bog terrestrial and aquatic habitats. The proposals incorporate a bespoke approach, where like-for-like compensation has not been provided for all habitat types (for example there is a greater emphasis on native woodland restoration), but for which the overall package is considered to provide significant positive effects, which will offset the significant negative effects using a holistic approach and provide significant landscape-scale enhancement.

Deer Exclusion: Native Woodland Creation and Peatland Restoration

FLS's deer management strategy within Glen Garry Forest aims to maintain deer densities between 2 and 7 deer/km² to support woodland regeneration and peatland restoration. Planned fencing repairs and targeted deer reductions are expected to bring numbers closer to the threshold required for successful natural regeneration, with NatureScot recommending densities below 3–5 deer/km² for effective recovery, particularly in sensitive habitats such as Caledonian pinewoods and broadleaf woodlands. In some areas within FLS holdings, woodland restoration may be viable without fencing, but ongoing monitoring will be essential to assess regeneration success and deer impacts.

To aid effective deer management, fencing improvements are planned. These improvements will help manage deer movement across key native-woodland habitats. However, complete deer exclusion is neither realistic nor desirable given the size of Glen Garry Forest. Instead, the strategy focuses on reducing grazing pressure to facilitate habitat recovery while maintaining a sustainable deer population. These fencing upgrades are expected to be completed before the start of the Proposed Development.

In East and West Glenquoich, current deer densities are estimated at 9.5 deer/km² and 7.2 deer/km², respectively, below the 10 deer/km² threshold often cited as viable for peatland restoration. Deer densities are expected to be low enough throughout the area to allow successful peatland restoration, assuming FLS repairs fencing and maintains reduced deer numbers. If the current deer densities can be maintained, then no further deer reductions are required to achieve peatland recovery.

To support targeted riparian woodland restoration, small, localised deer exclusion areas are proposed outside the main enclosure within FLS holdings, particularly in East and West Glenquoich Estates. These fenced areas will protect riparian woodland regeneration sites along Kingie Pool, Gearr Garry, Loch Poulary, and Loch Quoich, allowing native tree species to establish while maintaining ecological connectivity and reducing barriers to wildlife movement.

If FLS deer densities remain too high, an alternative approach could involve converting designated woodland areas into peatland habitats as a trade-off, ensuring the most viable restoration strategy for the landscape. Further consultation with FLS and Deer Management Groups (DMGs) will be required to monitor woodland recovery and determine if additional management interventions are needed.

INNS Rhododendron Control

Rhododendron control areas represent those areas within the wider locale, specifically West Glenquoich Estate and FLS Glengarry Forest, that are known to support this species, and for which semi-natural habitats would benefit from its removal.

Native Woodland Creation and Restoration

The majority of the semi-natural woodlands that would be lost to the Proposed Development are upland birchwoods with some native pinewoods, and small areas of Annex I Western acidic oakwoods and Caledonian pine forest), totalling 2.53ha of native woodland loss overall, with these losses predominantly associated with the SAR.

The scale of native woodland restoration should consider more than just an area for area compensation ratio for predicted losses (especially for ancient/priority woodlands), given the complexity and long-term nature of associated management prescriptions and condition monitoring, in addition to intended/predicted woodland composition/quality, existing restoration site conditions (including the presence of an existing seed source), herbivore management policies, and wider external factors.

Actions for native woodlands in the HNBAP include: Action 2 - *'protect, regenerate and restore native woodlands, including the control of INNS, conservation of veteran trees, and retention of deadwood'*, as well as Action 6 - *'identify, conserve, and expand from isolated trees and tiny woodland fragments'*.

The proposed areas for potential woodland restoration across East and West Glenquoich Estates and FLS Glengarry Forest collectively represent a significant area of land. Whilst further survey and feasibility assessments are required to refine the exact coverage of these restoration sites, these proposals are likely to generate a very significant enhancement beyond the required compensatory woodland creation/restoration.

Compensatory Planting

Compensatory woodland creation will offset the small-scale loss of woodland habitat while contributing to broader landscape-scale ecological benefits. In addition to meeting compensation requirements, new woodland planting will enhance connectivity between upland native woodlands, benefiting birds, mammals, and invertebrates. It will also improve riparian woodland corridors, providing essential habitat for fish, aquatic invertebrates, and otters, while delivering vital ecosystem services such as erosion control in upland areas, bank stabilisation, and shading for fish populations. This shading effect can help regulate water temperatures and promote aquatic invertebrate diversity, supporting the broader ecosystem.

Heathland

The Proposed Development would result in the direct loss of 82.13ha of Annex I Northern Atlantic wet heaths (H4010), 1.83ha of Annex I European dry heath (H4030), and 21.11ha of upland flushes, fens, and swamps (whilst this habitat is not characterised by dwarf shrub heaths, it is an important component of the moorland mosaic).

The proposed reinstatement of deer exclusion areas and associated culling would encompass and restore 310ha of open moorland habitats through the release from over-grazing, the majority of which is estimated to comprise heathland and bog habitats (based on a combination of habitat assessments undertaken by ADL, Land Cover Scotland LC88 data, and review of aerial imagery).

Watercourse and Aquatic/Riparian Enhancements

Enhancement and restoration various watercourses and waterbodies is proposed, with a specific focus on improving habitat suitability for breeding Common Scoter, as well as supporting the Upper Garry Salmon. Localised fencing will be implemented where necessary to support targeted planting and/or natural regeneration, ensuring riparian buffer zones exceed the 5m minimum required by the UK Forestry Standard (UKFS) Restoration projects are as follows:

The Garry Garry

Provision of a deer enclosure to promote natural regeneration of native woodland, including riparian woodland, with supplementary planting if necessary. Possible placing of suitable sediments to create areas of substrate suitable for salmon spawning.

The River Kingie

Removal of existing plantation forestry from the riparian zone and replacement with suitable native riparian woodland. Provision of fencing where necessary to promote the riparian woodland. Consideration of provision of large woody structures where appropriate.

Lochs Poulary and Kingie, Loyne, Lochan an Staic

Provision of artificial floating bird breeding islands in appropriate.

The Upper River Garry, including the tributaries Allt Choire a Bhalochain and Allt Fionn-dhail

Provision of suitable riparian planting to improve the habitat for wildlife and increase shading, benefiting aquatic species such as salmon and invertebrates

Loch Garry

Localised riparian habitat improvement to promote improvement in the breeding success of common scoter.

Lochan an Staic

Provision of suitable riparian planting around the loch to improve the habitat for various birds that habituate the area.

Loch Loyne

Creation of permanent waterbodies within the drawdown zone of the western end of Loch Loyne to increase the survival of invertebrates during drawdown of the reservoir. Provision of erosion protection to existing islands that are breeding sites for various species.

This proposed watercourse and aquatic/riparian restoration would provide some compensation for the loss or alteration of watercourses as a result of the Proposed Development (of which are associated with the PSH area), as well as the alterations to Loch Fearn itself (due to direct inundation within the PSH area, infrastructure erection, or alteration of hydrological regimes).

As Loch Fearn itself is considered to be utilised by Common Scoter for foraging purposes (with no identified breeding sites), restoration of existing waterbodies within the wider locale (with specific measures to enhance macroinvertebrate and macrophyte abundance/diversity), and potential creation of new permanent waterbodies within the drawdown zones of Loch Loyne, would aid in mitigating the loss of this suitable foraging site and enhance foraging provisioning overall. In combination with riparian restoration around suitable waterbodies to improve breeding habitat, as well as installation of artificial floating nesting islands, this would represent a significant enhancement for this nationally-rare

breeding bird, and would support the Conservation Objectives of the West Inverness-shire Lochs SPA⁵⁴.

The proposed restoration of riparian woodlands and watercourses in support of the Upper Garry Salmon Restoration Project is likely to represent a significant enhancement for spawning Atlantic salmon and brown trout across the River Garry network (where further assessment confirms the inaccessibility of Loch Fearn).

5.4 Goals and Objectives

The proposed goals and objectives of the BEMP are set out in Table 5-2.

Timescales and indicators are covered in more detail in Section 6.0 and Table 7-1.

⁵⁴ Available at: <https://www.nature.scot/sites/default/files/special-protection-area/9187/conservation-objectives.pdf>

Table 5-2: Proposed BEMP Goals and Objectives

Goal	Objective	Target	Quantity	Location	Timescales	Indicators
1. Blanket bog restoration	1.1 Undertake bog restoration to restore degraded/modified bog	Blanket bog/ degraded blanket bog	640ha	Bog Restoration Areas across East and Glenquoich Estates and FLS Glengarry Forest	Implementation to commence during construction period, with capital restoration works to be undertaken over 3-5 years.	Bog habitat condition. Water table raised.
	1.2 Creation/restoration of bog pool habitat	Bog pools, odonates	Quantity, locations, and timescales of bog pool creation/restoration to be determined through further survey, advised by the British Dragonfly Society, and in conjunction with larvae translocation programme.			Odonate population monitoring. Habitat condition.
2. Woodland restoration	2.1 Restore existing ancient woodlands through herbivory control and targeted regeneration	Semi-natural woodland (upland birchwoods, native pinewoods, Annex I Western acidic oakwoods	TBC	Riparian zone of Kingie Pool, Gearr Garry, Loch Poulary, the River Garry, and adjoining tributaries (Allt Choire a' Bhalachain and Allt Fionn-dhail), as well as more widely across FLS Glengarry Forest	Fencing erection and herbivore control implemented throughout the construction period..	Extent of woodland cover (natural regeneration). Habitat condition to assess woodland recovery.
	2.2 Create new native woodland to compensate for tree loss from the Proposed Development	New native woodland planting (species mix appropriate to site conditions, including birch, Scots pine, rowan, oak, alder, and willow)		Riparian zones: Gearr Garry River Kingie, Loch Quoich, Lochan an Staic.	Fencing and planting to commence before onset of construction. Adaptive management to ensure establishment success.	Tree survival rates and woodland establishment success.
	2.3 Regeneration of existing Annex I Caledonian pine	Annex I Caledonian pine forests (H91C0)	TBC	FLS Glengarry Forest (across Caledonian	Fencing reinstatement (over 3-year period), removal	Extent of woodland cover (natural

Goal	Objective	Target	Quantity	Location	Timescales	Indicators
	forests through removal of exotic timber in regeneration zones and controls on herbivory			Pinewood Inventory (regeneration zones)	of exotic timber within core and regeneration zones to begin prior to the commencement of construction and completed within the construction period, with targeted planting as required based on regeneration monitoring.	regeneration and tree survival). Habitat condition.
3. Enhancement of heathlands and other upland habitats	3.1 Reduction of deer numbers within FLS holdings to 4 deer/km ² to provide benefits to upland habitats	Upland habitat assemblage: wet and dry heath, blanket bog, upland flushes fens and swamps, acid grasslands	TBC	Within reinstated exclusion area of FLS Glengarry Forest.	Reduction culling within reinstated exclusion area to commence prior to the start of construction, to be undertaken over five years to reach target density. Target density maintained thereafter.	HIA. Deer count.
4. Watercourse and aquatic/ riparian enhancement	4.1 Restoration/ creation of Common Scoter breeding habitat	Common Scoter (and Black-throated Diver)	TBC	Kingie Pool, Loch Poulary, Lochan an Staic, Loch Garry within East Glenquoich Estates and FLS Glengarry Forest.	Restoration works, inclusive of exotic timber removal and targeted planting to begin during construction period, with capital restoration works to	Breeding population monitoring. Habitat condition.

Goal	Objective	Target	Quantity	Location	Timescales	Indicators
					be undertaken over 3-5 years.	
	4.2 Restoration/creation of riparian woodland	Riparian zone, fish, otter.	TBC	Riparian zone of Kingie Pool, Gearr Garry, Loch Poulary, the River Garry, and adjoining tributaries (Allt Choire a' Bhalachain and Allt Fionn-dhail).	Fencing erection and targeted planting to begin prior to the commencement of construction and completed within the construction period.	Extent of tree cover and survival. Habitat condition.
	4.3 Creation of permanent pools within Loch Loyne drawdown	Common Scoter, aquatic invertebrates	TBC	Loch Loyne/Loch Quoich within SSE ownership boundary.	Immediately following start of construction.	Common Scoter/macroinvertebrate monitoring. Habitat condition.
	4.4 Contribute to in-river improvements to optimise smolt trapping in the River Kingie	Fish (specifically salmonids)	Extent of contributions to be determined through further consultation with the NDSFB.	Existing smolt trapping location(s) on the River Kingie	Immediately following start of construction.	
5. Common Scoter management interventions	5.1 Installation of floating nesting rafts/islands	Common Scoter (and Black-throated Diver)	Locations and quantity to be determined in consultation with RSPB and following further monitoring, as well as in conjunction with wider Common Scoter habitat restoration.		Following start of construction.	Breeding population monitoring.
6. Dragonfly larvae translocation programme	6.1 Translocation of odonate larvae from bog pools within Proposed Development to existing/created bog pools.	Azure hawket and other odonate species	Quantity and locations to be determined through further consultation with the BDS and through further survey of suitable habitat.		Prior to commencement of construction	Odonate population monitoring

Goal	Objective	Target	Quantity	Location	Timescales	Indicators
7. INNS control and management	7.1 Eradication and control of INNS <i>Rhododendron ponticum</i>	INNS <i>Rhododendron ponticum</i>	>100ha	Riparian corridor of Eas Allt a' Mheil and adjoining LEPO woodlands to the south-west of Loch Fearn	Implemented during the construction period.	INNS re-invasion monitoring
8. Reinstatement of habitats disturbed during construction	8.1 Reinstatement of habitats temporarily disturbed during construction within the working corridor.	A range of upland habitats	TBC	Working corridor surrounding infrastructure footprint	Implementation within 1 year of completion of construction	Habitat condition.
9. Erection of artificial nest/roost boxes	9.1 Erection of bat and bird boxes.	Bat species, Dipper, Wagtails,	15 bat boxes, 5 Dipper/Wagtail boxes	Retained woodlands and new river bridges	Installed during the construction period.	N/A

5.5 Outline Habitat Creation and Restoration Methods

All management tasks carried out under the BEMP would be undertaken by suitably experienced contractors, under the supervision (where required/appropriate) of suitably qualified and experienced environmental professional, and specialist restoration practitioners where relevant.

5.5.1 Bog Restoration (Objective 1.1)

Bog restoration would be undertaken by appropriately experienced and qualified peatland restoration contractors.

Areas suitable for restoration, within which 640ha of bog restoration would be undertaken, are shown in Appendix A. The proposed restoration methods are based on published literature and established restoration methods⁵⁵.

The methods set out below are a high-level overview of the approach to be taken. This will be discussed with key stakeholders, including NatureScot and the chosen contractor, and the agreed approach and finalised locations will be set out in detail in the detailed BEMP post consent. The restoration areas would require a range of tailored approaches, which would be developed at the detailed BEMP/implementation stage (post consent), informed by further detailed survey work and consideration of restoration techniques available at the time of implementation. For all proposed Bog Restoration Areas, the following preparation work is proposed:

1. A peat depth survey and Peat Slide Risk Assessment of Bog Restoration Areas would be undertaken.
2. A botanical monitoring survey would be undertaken to establish an up-to-date baseline for the vegetation types present. The botanical survey, including HIA, paired with drone monitoring or other aerial photography, would then be used as a baseline for ongoing monitoring (see Section 6.1 for further details). Baseline botanical monitoring would be undertaken at an appropriate time of year, prior to restoration works.
3. A drain slope survey and mapping exercise would be undertaken across all Bog Restoration Areas, prior to restoration works, including hags and gullies. Taking levels of the drain water surface would allow for the creation of drain slope profiles across the restoration areas. In general terms, the aim would be to insert a dam for each 10cm drop in level of each drain / gully – this is intended to ensure that the water level across each restoration area is maintained within 10cm of the bog surface to allow for the growth of peat-forming plants. Analysis and mapping from drone orthomapping would also be undertaken, to derive the lengths of restoration (drains/gullies/hags), the extent and location of bare areas, and herbivore tracking.
4. A Construction, Environmental Management Plan (CEMP) for restoration works would be produced prior to the commencement of works.

The primary techniques that are likely to be used within the proposed restoration areas include:

- Reprofilling – This is the technique likely to be most frequently used for hag and gull restoration. Reprofilling would most likely involve the reprofiling of peat hags and other eroded banks to create a stable slope angle of approximately 30°, by rolling back the vegetation on the top of the hag, removing the underlying peat to create a stable sloping bank, and then rolling the vegetation back on and compacting to cover the newly profiled slope. For smaller

⁵⁵ NatureScot (2022). *Peatland ACTION – Technical Compendium*. Available at: <https://www.nature.scot/doc/peatland-action-technical-compendium>

hags, this is all that is likely to be required. In the case of larger hags, additional techniques may also be required, which would potentially involve re-vegetation of bare peat and further actions to provide sufficient stabilisation (see below).

- Bare area coverage and gully restoration – Flow management may be required initially in gully systems and peat pans, to slow the flow of water down. In gullies that have eroded to the mineral layer, stone dams or other specialist solutions may be required, depending on whether there is sufficient peat at the base of gullies. Surface bunds can be used in gullies, using materials such as peat turves, coir logs, wood, peat filled geo-textile sacks, heather bales or mineral. Following flow management, where required, stabilisation and revegetation would then be undertaken. Reprofilling of any gully or peat banks would be undertaken as described above for hag reprofilling. Where reprofilling is not possible, or there are large areas to cover, re-vegetation techniques may be required. This may involve the placing of textiles (such as coco mesh, sisal netting or geo-jute) over brash. Whole turving can also be undertaken to re-vegetate areas of bare peat, by covering with turves from donor sites. Transplanting plugs or propagules, or adding Sphagnum fragments onto bare peat to encourage revegetation can also be considered, as well as re-seeding with common cotton-grass (*Eriophorum angustifolium*).
- Any smaller drains/ditches present would be blocked with dams (such as using stone, wood, vegetation, and stumps). Wallage (2007)⁵⁶ found that drain blocking can be highly effective for improving both carbon storage and upland water quality. Peat excavated from construction activities can be used to block the drains in the peat restoration area, subject to suitability/feasibility. Dam location and frequency would be informed by drone orthomapping analysis and drain slope survey results, to inform the preparation of the detailed BEMP post consent.

These works should be undertaken outwith the breeding bird season, or if this is not practical following checks for breeding birds to allow mitigation to avoid disturbance to sensitive species and/or damage to active nests.

Herbivore impacts at proposed restoration areas within the FLS holdings would be managed via deer reduction culling, to a target density of 4 deer/km². Peatland restoration sites within the surrounding stalking estates (East and West Glenquoich, Foresight) where no such deer reduction culling has been proposed will require additional monitoring to determine the long-term efficacy of peatland restoration measures and associated herbivore impacts on these measures.

Bog restoration works would be undertaken in a staged manner, broken up into smaller areas, over 3-5 years.

Control plots of good condition blanket bog that the habitats within the peatland restoration areas could reasonably be expected to revert to following restoration works should be identified within the locale and monitored to aid in monitoring peatland restoration success and the setting of the site-specific vegetation targets for bog habitats (e.g. % cover of *Sphagnum* mosses etc.), along with identifying any possible changes in condition due to external factors.

⁵⁶ Wallage, Z. (2007) *Dissolved organic carbon and colour dynamics in drained and restored blanket peat*. PhD thesis, University of Leeds

5.5.2 Bog Pool Creation/Restoration (Objective 1.2)

In conjunction with the bog restoration methods outlined in Section 5.5.1 above, compensatory creation and restoration of bog pools will be conducted and undertaken by appropriately experienced and qualified peatland restoration contractors, in line with specifications from the BDS⁵⁷.

The proposed bog pool creation/restoration will be conducted within the identified bog restoration areas, and whilst it is recommended that the primary zone within FLS Glengarry Forest is prioritised for wider peatland restoration, the exact location and scale of bog pool creation/restoration will need be determined through further survey and consultation with the BDS, specifically in conjunction with the required dragonfly larvae translocation programme (see Section 5.5.5). This further assessment will consider restoration sites within closer proximity to Coires Dubh and Ghlas (likely within the secondary restoration zone), within which the existing azure hawker population was identified.

The bog pool specifications detailed below are formulated by the BDS, specifically for azure hawker (but beneficial to other breeding odonates), based on equivalent bog pool restoration works at Corrour Estate. The restoration areas are likely to require a range of tailored approaches, which would be further developed at the detailed BEMP/implementation stage (post-consent) and agreed upon with all relevant stakeholders and contractors, as informed by the further detailed survey work (inclusive of the peatland restoration preparation work detailed in Section 5.5.1). The BDS bog pool specifications are as follows:

- Pools of various dimensions and shapes should be created, covering between 5-30m², with prioritisation of long, sinuous pools.
- Water depth should be at least 70-100cm deep, to prevent summer drying and to provide adequate space for deep cover of *Sphagnum* mosses.
- Pools should be steep sided, with 30cm deep edges.
- Pools should be created in clusters of 3 or 4 individual pools, situated approx. 10 metres apart.
- Pools should be sited only on areas of deep peat, greater than 1m deep.
- All pools should be seeded/plugged with *Sphagnum cuspidatum*, targeted beneath sheltered pond edges.
- Pools, especially where long and sinuous, should be aligned from north to south to reduce wave action from the prevailing wind and prevent erosion.
- Pools should be sited within topographic depressions and/or beneath areas of upland flushes.

As with wider peatland restoration works, these works should be undertaken outwith the breeding bird season, or if this is not practical following checks for breeding birds to allow mitigation to avoid disturbance to sensitive species and/or damage to active nests.

Consideration of additional deer management controls will be required where bog pool creation/restoration is situated outside of the proposed deer exclusion/culling areas within FLS Glengarry Forest, specifically where sited within East and West Glenquoich Estates.

Control plots of good condition bog pools, specifically hosting breeding dragonfly, should be identified within the locale and monitored to aid in monitoring the success of new bog pool creation and the setting of the site-specific vegetation and dragonfly population targets for bog pool habitats, along with identifying any possible changes in condition due to external factors.

⁵⁷ British Dragonfly Society. *Creating Pools for Odonata: Azure hawker on Corrour Estate*. Available at: <https://british-dragonflies.org.uk/wp-content/uploads/2024/09/Creating-Pools-for-Dragonflies-2-1.pdf>

5.5.3 Deer Enclosure/Culling: Woodland Creation/Restoration (Objectives 2.1, 2.2, 2.3, 3.1, 4.2)

Proposed reinstatement of the existing deer exclusion area would extend from between Poulary Bridge and Loch Garry and from Kilfinnan Farm to the River Garry in the east, and subsequently encompassing the proposed woodland restoration areas within the FLS Glengarry ownership boundary, along the River Garry and adjoining tributaries.

The precise areas of reinstatement and new fencing would be subject to a fencing contractor walkover, as part of the development of the detailed BEMP, post-consent.

The proposed fencing configuration would also take into consideration any sensitive bird sites and will be positioned to allow for adequate visibility of the structure as a whole, specifically when in proximity to woodland edge. Furthermore, all new fencing would also have angled wooden droppers installed along the entire fence line at an appropriate height and spacing to ensure adequate visibility⁵⁸, and subsequently reduce collision risk for a number of bird species, including Black Grouse, Woodcock (*Scolopax rusticola*), and Snipe (*Gallinago gallinago*). Where existing fencing is to be replaced, it is critical that all replaced, degenerated fencing material is removed from the landscape and appropriately disposed of, as this material can still present a significant collision risk to birds when retained, particularly when a new replacement fence line is installed in close proximity.

The process of erecting all proposed deer fencing would begin prior to the start of construction and will be completed within a three-year period, in conjunction with associated culling management, in order to facilitate successful tree planting and regeneration at as early stage as possible.

An outline of the proposed woodland zoning is provided below. More detailed woodland zoning and planting proposals would be developed as part of the detailed BEMP, post-consent, which would be informed by ground survey. The detailed woodland scheme/s would be developed, and implementation overseen, by an experienced woodland specialist.

Outline prescriptions for each proposed woodland type are summarised below.

1. Regeneration of 31.77ha of Annex I Caledonian pine forests.

A total of 251ha of remnant Annex I Caledonian pine forest fragments were identified as present throughout the FLS Glengarry Forest holdings in the 1990's (Core areas), with the identified regeneration areas (consisting of 100m buffers on all remnant parcels) totalling 907ha and the overall Caledonian Pinewood Inventory site consisting of Core, Regen and Buffer areas totalling 4111 ha. A single Caledonian forest core fragment covering 4.6ha within the riparian zone of Allt Garaidh Ghualaich (a tributary of the River Garry), and the surrounding 27.2ha regeneration zone, has been proposed for active restoration as part of the mitigation for the Proposed Development.

The restoration prescriptions for these Native Pinewood habitats include the removal of all non-native conifers within the identified 27.2ha regeneration zone, namely all Sitka spruce (*Picea sitchensis*) and Lodgepole pine (*Pinus contorta*), in conjunction with reducing herbivore impacts by focused deer-culling. These prescriptions should facilitate further natural regeneration of the Caledonian pinewood habitat and an improvement in the condition and structure of the woodland

2. Following the implementation of these management prescriptions, annual monitoring should be conducted to assess the natural regeneration rate across the restoration area.

⁵⁸ Forestry Commission (2012). *Fence marking to reduce grouse collisions*. Available at: <https://cdn.forestryresearch.gov.uk/2012/12/fctn019.pdf>

The riparian zones of the Garr Garry, River Kingie, River Garry and its tributaries (Allt Choire a' Bhalachain and Allt Fionn-dhail), and associated waterbodies, namely Kingie Pool, Loch Poulary, and Loch Garry, are largely characterised by open heathland and grassland habitats, as well as commercial forestry at various stages of rotational management, with a notable sparsity/absence of semi-natural woodlands. The smaller parcels of ancient riparian woodland that are present on Kingie Pool and Garr Garry, have been specifically identified as 'ghost woodlands'⁵⁹, which are characterised as ancient woodlands that have lost 80% of their tree cover and are at risk of disappearance. As such, a total of no less than 200ha of native riparian woodland creation and restoration has been proposed, to expand coverage of these priority habitats, re-establish ecological connectivity at a landscape scale, and support the Upper Garry Salmon Restoration Project.

The woodland creation prescriptions will largely centre on targeted planting of native trees and shrubs across the riparian zone, specifically within areas where an existing seed source is not present and the natural regeneration rate is likely to be inadequate (for shorter-term woodland establishment), in combination with deer exclusion through fencing and culling. The priority within these areas is to create woodland cover over as short a term as possible, to provide a nucleated seed source from which natural regeneration can extend out from through the wider riparian zone. Areas of wetland, peatland, and other carbon rich soils within these areas would not be planted, such that the overall woodland is open and avoids sensitive habitats. Planting design will further incorporate spacing that will allow for trees to grow fuller crowns, therefore increasing their ability to produce seed in the longer term and contribute to a greater natural regeneration rate.

The first phase planting mix for new riparian woodland creation should comprise predominantly fast-growing early successional species, including downy birch (*Betula pubescens*), rowan (*Sorbus aucuparia*), alder (*Alnus glutinosa*), aspen (*Populus tremula*), grey willow (*Salix cinerea*), and eared willow (*Salix aurita*), which will readily colonise non-wooded habitats, stabilise and naturally-enrich existing soils, and allow for slower-growing late successional tree species to establish in the second lower density phase of planting, inclusive of sessile oak (*Quercus petraea*) and Scot's pine (*Pinus sylvestris*).

To note, the proposed riparian woodland creation surrounding Allt Fionn-dhail and eastward from the confluence of this tributary with the River Garry, is situated within the established Caledonian Pinewood buffer zone, which extends 500m beyond all existing pinewood fragments within FLS Glengarry Forest. In order to protect and maintain the ancient endemic genetics of these remnant pinewood fragments, Scot's pine (specifically of non-Caledonian pinewood lineage) should not be included within the riparian planting mix within this buffer zone.

Further to this phased nucleation planting, the exact species mix for each area of planting should be tailored to the existing/predicted future ground conditions, specifically regarding the level of soil moisture and potential for inundation during flood events/periods of high rainfall. In this regard, exact woodland zoning and planting proposals will be refined as part of the detailed BEMP, post consent, in line with UK Forestry Standard Practice⁶⁰ and Keeping Rivers Cool guidance⁶¹.

Regarding restoration of ancient woodland parcels within the riparian zone, management prescriptions will initially consist of installing localised deer exclusionary fencing, with the expectation being that this release from over-browsing will facilitate natural regeneration from the existing seed source. However, given the sparsity of the existing tree cover within these 'ghost woodlands', where it is determined by

⁵⁹ Future Woodlands Scotland. A new tool to help restore Scotland's Ancient Woodlands. Available at: <https://futurewoodlands.org.uk/a-new-tool-to-identify-ghost-woodlands/>

⁶⁰ Forestry Research. *Creating and managing riparian woodlands. UK Forestry Standard Practice Guide*. Available at: https://cdn.forestryresearch.gov.uk/2024/07/UKFSPG028_Riparian-woodland_web-compressed.pdf

⁶¹ Keeping Rivers Cool Partnership Initiative. *Keeping Rivers Cool: A Guidance Manual*. Available at: <https://www.woodlandtrust.org.uk/media/1761/keeping-rivers-cool.pdf>

the competent authority through continued habitat monitoring that the regeneration rate is inadequate for long-term restoration, then targeted supplementary native tree planting will be required.

5.5.4 Aquatic/Riparian Enhancements

Common Scoter Habitat Restoration (Objective 4.1)

Proposed potential habitat restoration areas for Common Scoter include Lochan na Staic, Kingie Pool, Loch Poullary, and Loch Garry within the FLS Glengarry Forest and East Glenquoich Estates, with the exact locations, scale, and appropriate management prescriptions being determined through further survey and consultation with the RSPB.

Based on current research of Common Scoter habitat selection, specifically within Scotland^{62,63, 64}, the primary factors that determine selection of waterbodies for both foraging and breeding include the following:

- Varied prey availability, specifically of aquatic macroinvertebrates within the shallower littoral zone;
- Presence of brown trout and other fish, and associated competition for macroinvertebrate prey;
- Proximity to woodland cover, specifically conifer plantation, and associated mammalian predation risk; *and*
- Availability of suitable ground nesting cover surrounding waterbodies and on isolated islands.

As such, in line with this research, management prescriptions/further assessment at targeted waterbodies are likely to include the following:

- Further assessment of existing baseline macroinvertebrate diversity and abundance within targeted waterbodies to inform the need for remedial restoration works, specifically associated with improving water quality, macrophyte cover, and surrounding terrestrial vegetation.
- Further assessment of baseline fish populations, specifically of brown trout, within targeted waterbodies to determine initial feasibility of restoration and requirements for any remedial measures in consultation with the NDSFB, such as increases in angling.
- Clearance of non-native conifer plantation within an appropriate buffer of targeted waterbodies/existing breeding sites, including both planted stands and regen, in combination with localised restoration of peatlands and heathland within these buffer zones.
- In conjunction with non-native conifer clearance, controls on deer through localised exclusionary fencing and/or reduction culling (as proposed within FLS Glengarry Forest) should facilitate the regeneration of dwarf-shrub/scrub cover and associated nesting opportunities for Common Scoter. All fencing should be appropriately sited away from core restoration areas to prevent potential collision risk, with installation of wooden, angled droppers at appropriate intervals to further reduce this risk.
- Targeted planting of scrub species, including native willows (*Salix aurita* only.), and juniper (*Juniperus communis*), may be required where the natural regeneration rate and/or associated diversity of scrub cover is deemed to be inadequate for restoration over a shorter-term.

⁶² Hughes, R., Klein D., Andersen, R., Anderson, R., Gullet, P.R., Littlewood, N. (2024) *Breeding Common Scoters Melanitta nigra in Scotland's Flow Country: a population in decline despite productivity being stable*. Bird Study 71(3)

⁶³ Hancock, M.H., Robson, H.J., Smith, T.D., Douse, A. (2019) *Spatial and temporal patterns of foraging activity by breeding Common Scoters (Melanitta nigra) in Scotland*. Ornis Fennica 96: 124-141

⁶⁴ Hancock, M.H., Robson, H.J., Smith, T.D., Stephen, A., et al. (2020). *From a research study to a conservation partnership: Developing approaches to restoring Common Scoter populations*. Aquatic Conservation Marine and Freshwater Ecosystems 30(9): 1770-1774

In addition to the targeted restoration of alternative waterbodies outlined above, further restoration of existing Common Scoter nesting sites on Loch Garry and associated islands has been proposed, through management prescriptions including localised control of bracken and non-native conifer regen, woodland thinning to suppress over-shading and improve ground vegetation cover for nesting, as well as measures to control erosion around the perimeters of islands utilised by breeding Scoter. The scale and further monitoring of these management prescriptions will be determined through further consultation with the RSPB. (suspect that there is little or no evidence of the direct impact of these activities in relation to populations?)

Permanent Pool Creation within Loch Loyne Drawdown (Objective 4.3)

In combination with the habitat restoration proposals outlined above, targeting specifically Common Scoter, further direct creation of permanent foraging pools within the drawdown zone of Loch Loyne has also been proposed.

The existing management of Loch Loyne from SSE consists of maintaining high water levels in the summer months to protect known breeding sites on isolated islands within this waterbody from mammalian predators, as well as to maximise the area of shallow water available for foraging opportunities, particularly for Common Scoter ducklings. During the autumn and winter months, water levels are then artificially depleted as part of the hydropower scheme on this waterbody, subsequently exposing the extensive unvegetated drawdown zone.

As such, creation of permanent pools within this drawdown zone would act to maintain year-round parcels of standing water, providing a refuge for aquatic invertebrates during periods of low water, and sustaining favourable conditions for survival of these invertebrates over winter months. Such that, when Common Scoter and other birds return to these breeding grounds in the spring, foraging opportunities for these species will be more widely available.

Exact specifications and locations of these permanent pools will be agreed upon through further consultation with the RSPB and relevant stakeholders, but the management prescriptions should consider the following, in line with current research/guidance^{63,62,65,66}:

- Availability and accessibility of aquatic macroinvertebrate prey items for Common Scoter is largely associated with water depth, particularly for ducklings, which have a reduced diving depth compared to adults and spend the majority of their time foraging in shallow waters <1.3m deep. As such, permanent pool creation should incorporate a variety of water depths and diverse drawdown zone/marginal habitat, to expand suitability for a greater diversity of invertebrate species and macrophytes, whilst also maximising the coverage of shallow waters, specifically <1.3m deep.
- Permanent pools should be incorporated into the existing topography and sited within close proximity to other wetland or freshwater habitats, to generate greater ecological connectivity, as well as to ensure water levels are naturally sustained throughout the winter months through surface run-off and/or direct connection to small watercourses. In this regard, it is critical to consider surrounding land-use and potential sources of water pollution, as high water quality will be required to support a diverse aquatic macroinvertebrate community.
- Pool siting should also avoid positions with a greater level of exposure, to prevent erosion of pool margins associated with the prevailing wind and subsequent wave action, as well as to create a more consistent microclimate for macroinvertebrates where possible.

⁶⁵ Freshwater Habitats Trust (2022). *Pond Creation Toolkit – Pond Design*. Available at: <https://freshwaterhabitats.b-cdn.net/app/uploads/2022/11/pond-design.pdf>

⁶⁶ SEPA (2000) *Ponds, pools, and lochans – Guidance on good practice in the management and creation of small waterbodies in Scotland*. Available at: https://www.sepa.org.uk/media/151336/ponds_pools_lochans.pdf

- Permanent pool creation should be combined with localised restoration of adjoining terrestrial areas where possible, to expand habitat provisioning for a range of macroinvertebrates, as well as to provide potential nesting cover for Common Scoter, in line with the management prescriptions outlined for Objective 4.1.

Common Scoter Nesting Island Installation (Objective 5.1)

In conjunction with above detailed habitat restoration proposals for Common Scoter, the further installation of artificial nesting islands has been proposed, siting and quantity of which will be determined through further consultation with the RSPB.

Based on targeted monitoring of Common Scoter breeding success within the West Inverness-shire Lochs SPA, as well as contemporary Scotland-wide research^{62,63,64}, predation risk from mammalian predators (notably red fox (*Vulpes vulpes*) and pine marten (*Martes martes*)) can present a significant barrier to breeding success for this nationally-scarce species, particularly within areas with a high coverage of conifer plantations. As such, based on the ineffectiveness and/or costs of alternative measures to reduce predation risk, including anti-predator fencing (which can present a collision risk itself to breeding Common Scoter) and diversionary feeding (which demands sustained long-term application for uncertain results), the installation of artificial floating nest sites on suitable waterbodies presents an effective solution. Other such floating nest sites have already been deployed within other waterbodies across the West Inverness-shire Lochs SPA, with these features additionally benefitting breeding Black-throated Diver.

Optimisation of River Kingie Smolt Trapping (Objective 4.5)

Through ongoing consultation with the NDSFB, optimisation of the existing smolt trapping arrangements along the River Kingie has been proposed. The trapping and trucking of Atlantic salmon smolts is considered one of the most significant advances that could be made in the Upper Garry as part of the wider salmon restoration project along this watercourse, based on the current restrictions on fish movements and associated mortality with existing dam features along the River Garry.

A trial operation conducted in the spring of 2024 utilising a rotary screw trap within the River Kingie, caught about 35% of salmon smolts, which were then transported downstream beyond existing artificial barriers. Optimising this trapping rate will involve consideration of different trapping systems and locations in consultation with the NDSFB and other relevant stakeholders.

5.5.5 Dragonfly Larvae Translocation Programme (Objective 6.1)

In conjunction with the proposed compensatory bog pool creation/restoration, specifically for odonates (see Section 5.5.2), a full dragonfly larvae translocation programme has also been proposed, targeting existing bog pool breeding sites of azure hawkers and other species within Coires Ghlas and Dubh, which are predicted to be lost within the Proposed Development.

The methodology and monitoring of this proposed translocation programme will be designed in line with The Scottish Code for Conservation Translocations⁶⁷ and further advice from BDS. The first stage of the translocation programme will require the identification of suitable recipient sites prior to the commencement of construction, either through direct bog pool creation/restoration (see Section 5.5.2) or through further survey to identify existing suitable bog pool sites, or a combination of both. Given

⁶⁷ National Species Reintroduction Forum (2014). *The Scottish Code for Conservation Translocations – Best Practice Guidelines for Conservation Translocations in Scotland*. Available at: <https://digital.nls.uk/pubs/e-monographs/2020/216528031.23.pdf>

that newly created bog pools typically require 1 to 3 years to develop conditions suitable for dragonfly larvae, this habitat creation will be prioritised early in the project timeline to maximise the likelihood of translocation success

5.5.6 INNS Rhododendron Control (Objective 7.1)

The primary rhododendron control area identified within West Glenquoich Estate, to the north of Loch Quoich and extending between Allt Fearna and Allt Coire Peitireach, as well as reaching elevations of 500m+ within Coires Dubh and Peitireach, is proposed for a combination of both extensive removal of INNS rhododendron and subsequent management that allows for the regeneration of the associated native woodlands, inclusive of ancient LEPO woodlands.

The methodology for the eradication and long-term management of rhododendron should be designed in line with established INNS management guidance^{68,69}, and conducted by an appropriately experienced and qualified contractor. Following repeated annual treatments, control areas would be monitored for regrowth for at least ten years, with repeated treatments as necessary.

In conjunction with rhododendron removal, management prescriptions to facilitate the regeneration of surrounding native woodlands should include reduction in herbivore impacts through the establishment of a number of large deer-proof exclosures, designed to also include and facilitate a significant area of new native woodland creation in this area.

[Based on the existing extent and density of rhododendron, the subsequent removal of this INNS is likely to create extensive areas of bare ground, with the management processes themselves generating significant disturbance (ideally not!). As such, where the natural regeneration rate is determined to be too restricted,] remove/reword

More detailed woodland zoning and planting proposals would be developed as part of the detailed BEMP, post-consent, which would be informed by ground survey.

5.5.7 Habitat Reinstatement (Objective 8.1)

Reinstatement of areas subject to temporary disturbance/damage during construction (i.e., within the working corridor, but beyond the permanent infrastructure or inundation areas) would be undertaken as soon as reasonably practical following construction. Prompt implementation of reinstatement measures would aim to reduce the effects of compaction of subsoil (which can lead to inhibited drainage and root growth), and exposed ground (which can cause loss of topsoil, dust and water pollution through wind blow and erosion). Prompt reinstatement would also help to ensure integrity of the vegetation seed bank is maintained.

Planned reinstatement would be informed by further consultation with stakeholders, preconstruction surveys and site conditions. Reinstatement details would be included and confirmed in the CEMD and detailed BEMP, post consent. Reinstatement is likely to comprise the following considerations and measures:

- Temporary working areas will be reinstated to their original condition and returned to their previous use, usually within the autumn following the construction phase;

⁶⁸ Forestry Commission Scotland *Guidance for delivering invasive non-native plant control projects*. Available at: <https://www.forestry.gov.scot/forests-environment/biodiversity/non-native-species/invasive-rhododendron>

⁶⁹ Scottish Forestry. An approach to prioritising control of rhododendron in Scotland. Available at: <https://www.forestry.gov.scot/forests-environment/biodiversity/non-native-species/invasive-rhododendron>

- Excavated materials would be stored according to good practice taking care to separate turves, topsoils, soils and peat layers;
- Reinstatement would ensure that soils are carefully replaced in the correct soil profile, and that turves are replaced on the surface;
- Where compaction may have occurred a 'sub-soiler', which lifts and shatters the subsoil will be used before the topsoil is reinstated, if necessary;
- Stripped soil will be reinstated as close to where it was removed as possible; *and*
- Reinstatement works would be undertaken in suitable weather conditions, avoiding very wet conditions or very hot, dry and windy conditions, if possible.

Once construction has finished and the soils and turves have been replaced in the correct profile, it is expected that grassland and heathland vegetation would be allowed to naturally re-generate from the seed bank within the soil and seeds from the turves and adjacent vegetation.

The re-establishment of heathland involves the development of ericoid dwarf shrub dominance which then creates a micro-climate suitable for establishing and maintaining heathland vegetation. Heather seeds have long longevity (up to 70 years in some situations), and therefore there should be a good viable seed source within the soil. On this basis, there is a high likelihood that the natural regeneration of heathland vegetation would be successful. Similarly, it is expected that the grasslands would regenerate from the existing seed bank.

However, this would be monitored and in the unlikely event that natural regeneration of heathland or grassland vegetation is unsuccessful within a reasonable timescale, then remedial measures will be considered, such as seeding, spreading heather brash, or using donor turves (see Section 6.1.8).

5.5.8 Artificial Nest/Roost Boxes (Objective 9.1)

Bats

Bat species (common pipistrelle, soprano pipistrelle, brown long-eared bat and *Myotis* sp.) have been recorded along the SAR, specifically at existing bridges along the River Garry and adjoining tributaries. Small-scale losses of foraging and commuting habitat for bats is to be lost within the Proposed Development, specifically along the SAR, including native woodlands. Based on the proposed scale of woodland creation/restoration, this is expected to lead to a significant enhancement of foraging and commuting habitat for bats in the locale. However, there is a notable absence of roosting opportunities for bats within the site and wider survey area, particularly along the western extent of the SAR.

As such, a total of 15 bat boxes would be installed, on mature trees in retained native woodlands, and on the new proposed bridge crossings along the SAR. The specifications would include at least five boxes suitable for maternity colonies, five boxes suitable for hibernating bats, and five suitable for typical summer roosts. The box specifications would be suitable for crevice-dwelling species known to occur on the site including pipistrelles and *Myotis* sp.

Birds

Incidental records of active Dipper nests were noted beneath three of the existing road bridges across the River Garry and its tributaries and therefore based on the proposed replacement of these road bridges, there is a predicted loss of nesting opportunities for this BoCC Amber-listed species. As such, this loss will require compensation, preferably through a bridge design that maintains nesting ledges, such as along the exposed lateral steel beams beneath the bridge deck. Where such features are not included, then artificial nest boxes beneath the bridge deck should be provided instead.

As such, a total of five artificial nest boxes for dipper are proposed to compensate for the loss of nesting opportunities where new/replacement bridges do not accommodate suitable nesting ledges within the design.

5.6 External Factors

It is important to note that external factors such as climate change can influence habitat restoration success. Over the lifetime of the BEMP it is possible that climate change will affect the habitats on site and in the surrounding area. This should be considered during monitoring and reporting, including monitoring of control areas (see Section 6.0).

5.7 Ongoing Management and Maintenance

The requirement for ongoing management and maintenance will be determined based on monitoring results (see Section 6.0). Requirements are likely to include:

- Peatland restoration areas:
 - Repair of any dams that are eroded or otherwise damaged, as required, subject to the outcome of monitoring (see Section 6.3).
 - Manage and control herbivore impacts.
- Rhododendron control areas:
 - Additional follow-up treatments of rhododendron, e.g. if new plants are identified (e.g. at year 3 and year 5).
- Deer control areas:
 - Ongoing deer control to maintain the target density.
- Woodland creation – compensatory planting enclosures:
 - Ongoing repair of any damaged fencing, and removal cull of any deer that have breached the deer enclosure area. The fence line would be inspected every three months for damage or weaknesses and repaired as required. The enclosure would be checked annually during spring for deer that may have breached the fence line, using a thermal drone. Any such deer identified within the enclosure would be culled.
- Woodland restoration enclosures – as above.
- Nesting islands, boxes, and other species-specific habitat features:
 - Replacing any damaged or missing nesting islands, boxes, and habitat features.

Further remedial action may be required if monitoring indicates that the BEMP goals and objectives are not being met, as detailed in Section 6.1.8.

6 MONITORING AND REVIEW

All monitoring would be undertaken by suitably qualified and experienced environmental professionals.

The purpose of the proposed monitoring is twofold. First it would aim to document the development of habitats within the BEMP areas, which would determine the extent to which the overall goals and objectives of the BEMP are being met. Secondly, it would inform the need for ongoing adaptive management and remedial action.

Monitoring would record the following indicators, as appropriate, to monitor progress towards achieving the BEMP goals and objectives:

- Condition of restored, created and reinstated habitats, including herbivore impacts;
- Rhododendron cover;
- Water table;
- Tree growth and survival;
- Species population monitoring; and
- Uptake/functionality of nesting islands, boxes and other species-specific habitat features.

6.1 Botanical Monitoring

6.1.1 Drone Survey

A drone survey or other aerial photography survey would be undertaken of the BEMP areas, to document the baseline and monitor vegetation changes using drone-captured high resolution aerial images. This survey technique would first be undertaken prior to restoration measures to provide an up-to-date baseline. This would then be undertaken in Year 1 and Year 5 after completion of the initial restoration measures, and repeated every five years until at least Year 20, with the frequency of further monitoring determined in Year 20. The drone surveys would be undertaken during summer, at a similar time of year each year, to allow for comparison of the captured aerial photographs to be undertaken to establish if, and to what extent, restoration of the target vegetation has taken place. The survey would also be used to monitor bracken and tree regeneration extent.

The drone survey would be supported by ground-based botanical monitoring. The methods of botanical monitoring would be detailed in the BEMP and would be bespoke to allow for the specific monitoring against the BEMP objectives. The likely methodologies are summarised below.

6.1.2 Common Standards Monitoring

The ground-based botanical monitoring for BEMP areas, is likely to be based on the Common Standards Monitoring (CSM) protocol for upland habitats⁷⁰ (or successor if this is updated prior to monitoring commencing), which assesses habitat condition.

CSM provides a detailed insight into the changes in vegetation and some abiotic factors that pick-up trends in vegetation changes that are valuable to understanding the progress of habitat restoration and management works and informing further management. CSM is designed to assess whether features

⁷⁰ Joint Nature Conservation Committee (2005) *Common Standards Monitoring Guidance for Upland Habitats*. Version May 2005. Joint Nature Conservation Committee, Peterborough.

(e.g., habitats) are in favourable or unfavourable condition and whether condition is being maintained, recovering, or declining over time. The assessment is based on habitat-specific criteria involving key indicator species and vegetation structure.

CSM would be undertaken in the peatland restoration areas, and control sites, to assess the progress of restoration techniques implemented. CSM would also be undertaken at sample locations across the deer control areas, monitoring the change in habitat condition driven by the restoration and management actions.

The thresholds used in CSM for delineating habitat condition were originally designed to reflect the minimum standard for SSSI site selection. However, the objective of this BEMP is to improve habitat condition beyond baseline levels, rather than meet SSSI selection criteria. Therefore, CSM thresholds may be adjusted following the first round of data collection to ensure they align with realistic and ecologically meaningful restoration targets. These targets will be refined in subsequent BEMP revisions based on monitoring results.

CSM transect lines would be set up in peatland restoration areas to give coverage of each restoration area. Transects would also be set up within the bog control areas, and a sample of upland habitats within the deer control areas. Grid references would be recorded to allow re-location on return monitoring visits. Quadrat sampling along the transect lines would use 2m x 2m quadrats.

The criteria used to assess the data from each quadrat would depend on the vegetation community within the quadrat. CSM guidance provides a list of which NVC communities compose each of the broader habitat types that CSM relates to. Therefore, the surveyor would record the NVC community for each quadrat to make sure that it is assessed using the correct criteria.

6.1.3 Peatland Condition

Peatland restoration areas would also be monitored for Peatland Condition, using criteria within NatureScot's Peatland Action Peatland Condition Assessment Guide⁷¹, with the peatland restoration areas being classified as in 'near-natural, modified, drained or actively eroding' condition. A condition of 'near-natural' would be targeted for peatland restoration area. This assessment would be undertaken at the same time. A HIA would be undertaken within each CSM quadrat, and within the area surrounding each CSM quadrat where the assessment calls for a larger sample area.

6.1.4 Herbivore Impact Assessment

Monitoring would assess the impacts of herbivore grazing/browsing across the BEMP areas. The assessment would follow the Best Practice Guides' Habitat Impact Assessment (HIA)⁷² method for assessing locations across the BEMP areas, with woodland habitats assessed using the Woodland Grazing Toolbox methodology (Armstrong et al 2023) in the same locations as the CSM monitoring so that these surveys can be undertaken at the same time. A HIA would be undertaken within each CSM quadrat, and within the area surrounding each CSM quadrat where the assessment calls for a larger sample area.

A target of 'Low'/'Light' browsing and trampling impacts across all sample points/quadrats will be expected to be maintained for the project duration.

⁷¹ NatureScot Peatland ACTION. *Peatland Condition Assessment*. Available at: <https://www.nature.scot/sites/default/files/2023-02/Guidance-Peatland-Action-Peatland-Condition-Assessment-Guide-A1916874.pdf>

⁷² Wild Deer Best Practice Guidance for Scotland. Available at: <https://bestpracticeguides.org.uk/statutory-guides/deer-impacts/>

6.1.5 Bracken

Within bracken control areas (specifically within Common Scoter nesting sites), notes would be taken on the % cover of bracken and its health. Re-growth would be monitored annually for the first five years, and then monitoring would continue in tandem with the botanical monitoring programme.

6.1.6 Rhododendron

Areas where the removal of INNS rhododendron has taken place would be monitored yearly following treatment, for a minimum of five years, and thereafter as required based on assessments of regeneration. Where rhododendron is regenerating, or in other areas where new plants are identified, further treatment should be applied to keep this species under control.

6.1.7 Monitoring Programme

Botanical monitoring would be undertaken during the optimal survey period for plant species (May – August inclusive). As with the drone survey, the botanical monitoring (excluding monitoring of bracken and rhododendron) would be undertaken during the summer prior to restoration measures, to provide a baseline. Further monitoring of the BEMP areas (to assess changes to the baseline) would then take place in the first year following restoration, then again in Year 5, and repeated every five years thereafter, until at least Year 20, with the frequency of further monitoring determined in Year 20.

6.1.8 Remedial Action

Should the botanical monitoring find that target conditions, and therefore the goals and objectives of the BEMP are not being met, then remedial action would be employed, and the BEMP updated accordingly, in consultation with the BEMP Working Group. Remedial actions would be dependent on the habitat and nature of the goal/objective not being met. Possible remediation measures could include:

- If bog plants are not successfully regenerating in peatland restoration areas as expected, then re-seeding/re-vegetation techniques would be explored;
- If bracken persists within bracken control areas, then repeat treatment and aftercare would continue as required, or alternative treatments tried, to suppress bracken growth; and
- If monitoring shows that herbivore impacts are too high and are resulting in peatland restoration objectives or other relevant restoration objectives not being met, then deer densities would be reduced to allow the objectives to be met.

6.2 Monitoring of Peatland Restoration Water Table Height

Monitoring of water table height within peatland restoration areas would take place by the installation and monitoring of hand-driven dipwells (or a similar method for monitoring water table levels). If feasible, dipwells would be installed prior to peatland restoration actions, to enable a baseline to be established. The location and density of dipwells would be determined within the detailed BEMP.

Unless the water table monitoring method selected allows for continuous data logging at set intervals, quarterly monitoring of dipwells would be undertaken in each monitoring year, to measure water levels and assess if they are high enough to promote bog vegetation growth.

Dipwell monitoring would be undertaken prior to the peatland restoration works to provide a baseline (where feasible), as well as in the first year and fifth year following restoration, with the need for further monitoring determined in year five, depending on monitoring results.

6.3 Checks of Bog Restoration Dams

For the peatland restoration to be successful the dams that are created during the restoration process need to remain effective. During ditch/gully blocking, all the dam locations would be recorded.

In the first two monitoring years all the dam locations would be checked for signs of effectiveness, damage and requirements for maintenance. In subsequent monitoring years (alongside the botanical monitoring), especially if dam performance has been good with little maintenance requirement, then it may be appropriate to spot check only a proportion of dam locations.

6.4 Monitoring of Bog Pools for Odonata

Monitoring of bog pools created or restored specifically for odonates will be undertaken annually to evaluate their suitability and effectiveness in supporting dragonfly populations, including the azure hawker. Surveys will be carried out annually during the peak flight period (June to August) to record adult odonate presence, abundance, and diversity. In addition, periodic sampling of larvae will be conducted to confirm successful breeding and larval development within the pools. Monitoring will also include assessments of water quality parameters, aquatic vegetation establishment, and prey availability to ensure conditions remain optimal for odonate populations. Data collected will inform adaptive management practices, allowing for adjustments to restoration methods as needed.

6.5 Monitoring of Woodland Creation and Woodland Restoration Activity

A suitably qualified forester would inspect the implementation of the native woodland restoration and woodland creation projects to ensure that Compensatory Planting and Biodiversity Net Gain objectives are on track for delivery. Reviews would be at regular intervals (Years 1 - 5 and 10) to ensure successful new woodland establishment and improvements in the condition of existing native woodland habitats.

6.6 Monitoring of Nesting Islands, Boxes, and Other Habitat Features

The boxes and other habitat features (listed in Section 5.5.7) would require a regime of inspection, such that damaged features can be identified, fixed, or replaced. The precise details will be developed and contained within the final BEMP.

6.7 Ornithological Monitoring

Monitoring of the Common Scoter and Black-throated Diver populations would be undertaken, to understand any effect of the operation of the Proposed Development. The results of the monitoring would be used to inform the installation of further Scoter/Diver nesting rafts, if considered appropriate in the light of monitoring results. Population monitoring would be undertaken during construction, and for five years post-construction.

6.8 Aquatic Monitoring

A programme of water quality and aquatic monitoring would be undertaken during and after construction, which would be included within the CEMD, and is not detailed within this document.

6.9 Reporting and Review

Monitoring results would be reported annually (in years when monitoring takes place) and recommendations made for changes to management prescriptions if objectives are not being met, as appropriate. As such, the BEMP would be a live document, such that it can be altered following monitoring results, unexpected events or evolving guidance. Any amendments to the BEMP because of the outcome of monitoring would be agreed with the BEMP Working Group in advance of any such revised prescriptions being implemented (see Section 4.0). The BEMP would be reviewed every five years.

7 INDICATIVE PROGRAMME

An indicative programme for the implementation of management and monitoring works set out in this OBEMP is provided in Table 7-1. A more detailed programme would be provided in the detailed BEMP, post consent.

Task	Pre-construction	Construction (5-6 years)	Post-construction								
			Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 10	Yr 15	Yr 20	>20 years
Enabling Tasks											
Formation of BEMP working group											
Detailed BEMP preparation and finalisation											
Drain mapping/slope surveys, peat depth survey, Peat Slide Risk Assessment, drone orthomapping analysis, HIA, and CEMP for bog restoration areas.											
Dipwell installation in bog restoration areas											
Capital Works and Ongoing Management											
Peatland restoration works (damming, re-profiling, bare peat restoration)											
Deer exclusionary fencing installation											
Deer control: reduction culling											Ongoing for lifetime of the project
Tree planting											
Woodland creation aftercare and review period											
Removal of exotic timber and non-native conifer regen within Caledonian pinewood regeneration zones											
Rhododendron control											
Checks of fence lines											
Aquatic/riparian enhancements: Common Scoter breeding habitat enhancement, permanent pool creation in Loch Loyne, sediment transport improvements, smolt trapping optimisation on the River Kingie											
Re-instatement of habitats within temporary construction corridors											
Ongoing adaptive management and maintenance											
Monitoring and Associated Reporting											
Drone survey											Requirement for further monitoring to be
Botanical monitoring survey											
Drain blocking checks											

											determined in Year 20
Dipwell monitoring											
Monitoring of newly created bog pools for odonates											
Monitoring new woodland establishment											
Common Scoter/Diver monitoring (including floating nest islands)											
Monitoring functionality of boxes/species-specific habitat features											
BEMP Review and Adaptation											
BEMP review and updates											Every five years for lifetime of project
Ongoing adaptive management via agreement with BEMP working group (if required throughout)											

